

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

v.

MARIUS LAZAR
a/k/a Mario

§
§
§
§
§
§

CRIMINAL NO. 1:20cr78-3MAC/CLS

NOTICE

The government submits the following Declaration of Jeremy Scheetz, along with the Declarations supporting exhibits originally filed in United States vs Jonathan Joseph Nelson, et al (17-CR-533-EMC) in the Northern District of California, San Francisco Division, for the court's consideration.

Dated: October 20, 2023

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Christopher T. Rapp
CHRISTOPHER T. RAPP
Assistant U. S. Attorney
Arizona Bar No. 025704
550 Fannin St., Suite 1250
Beaumont, Texas 77701
(409) 839-2538
(409) 839-2550 (fax)
christopher.t.rapp@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion was provided to defense counsels on
October 20, 2023, via electronic transmission.

/s/ Christopher T. Rapp
CHRISTOPHER T. RAPP
Assistant United States Attorney

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney
2
3 HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division
4 AJAY KRISHNAMURTHY (CABN 305533)
KEVIN J. BARRY (CABN 229748)
5 Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
7 Telephone: (415) 436-7050
FAX: (415) 436-7050
8 Ajay.krishnamurthy@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) **CASE NO. 17-CR-533-EMC**
14)
Plaintiff,) Notice
15)
v.)
16)
JONATHAN JOSEPH NELSON et al,)
17)
Defendants.)
18

19 The United States respectfully submits the Declaration of Jeremy Scheetz, along with the
20 Declaration's supporting exhibits.

21 DATED: June 29, 2020

Respectfully submitted,

23 DAVID L. ANDERSON
United States Attorney

24
25 /s/ Ajay Krishnamurthy
AJAY KRISHNAMURTHY
26 KEVIN J. BARRY
27 Assistant United States Attorneys
28

1 I, Jeremy Scheetz, state as follows:

2 **Background**

3 1. Since 2003, I have been employed by the Bureau of Alcohol, Tobacco, Firearms and
4 Explosives (ATF). I was first hired as a Critical Information Specialist. In 2006, I transferred to the
5 Intelligence Research Specialist (IRS) job series in the Office of Strategic Intelligence and Information
6 (OSII). In 2014, I transitioned into the Intelligence Operations Specialist (IOS) job series within OSII. I
7 am currently employed as an Intelligence Operations Specialist. My CV is attached as Exhibit 1 to this
8 declaration.

9 2. Within ATF, the IOS position carries both analytical and operational responsibilities. As
10 an IOS, I analyze evidence seized during federal, state, and local investigations that involve a nexus to
11 ATF (such as violent crime, or firearms or explosives trafficking); provide intelligence to federal, state,
12 and local law enforcement officers; participate in investigations; debrief witnesses; and attend and
13 monitor relevant events.

14 3. In 2006, I attended the 10-week DEA Basic Intelligence Research Specialist Academy in
15 Quantico, Virginia, where I learned the basics of criminal intelligence. The majority of my training has
16 been on-the-job: from 2006 to 2014, I was partnered with a more experienced Intelligence Operations
17 Specialist with whom I worked closely. From him, I learned how to interview witnesses; how to write
18 law enforcement reports; how to analyze evidence; how to work events; and how to work with law
19 enforcement officers from federal, state, and local agencies.

20 4. Since 2006, my work has focused primarily on Outlaw Motorcycle Gangs (OMGs). An
21 OMG is a criminal organization whose members use their motorcycle clubs as criminal enterprises.
22 Historically, and as detailed below, members of OMGs have been responsible for drug and weapons
23 trafficking, extortion, and violent crime. In addition, many OMG members self-identify as "outlaws"
24 because their OMG does not belong to the American Motorcyclist Association. Law enforcement
25 officers investigate and monitor OMGs in part because of the historical and ongoing violence between
26 adversarial OMGs and between OMGs and civilians. Some of those violent incidents are documented
27 later in this affidavit.
28

1 5. During my career with ATF, I have been involved in over 1,000 investigations into
2 OMGs, motorcycle clubs, and supporters of OMGs in the United States, Canada, Asia, Australia,
3 Europe, and Central and South America. During these investigations, I have been responsible for
4 creating timelines and rosters, interviewing witnesses and confidential informants, conducting overt
5 surveillance, analyzing seized documents, briefing investigative officers about OMGs, serving as a
6 liaison between state and federal agencies, and helping prosecution teams prepare for trial. I have been
7 provided with documents seized from OMG members and clubhouses across the world—including the
8 Hells Angels. I have been provided with Hells Angels photographs, rulebooks, meeting minutes, rosters,
9 internal communications, and histories. I have also become familiar with violent incidents across the
10 world involving the Hells Angels and other OMGs. Since 2006, I have communicated on daily basis
11 with other law enforcement officers involved in OMG investigations (including investigations into Hells
12 Angels members, prospects, hangarounds, and associates) around the world. They share information
13 about their investigations with me, and I evaluate how this information fits into other events involving
14 that OMG. They also share photographs of OMG members, including Hells Angels members, prospects,
15 and hangarounds, and we discuss the visual symbols (such as patches or tattoos) that the individual is
16 wearing. As described below, those symbols can commemorate a specific act that the individual has
17 committed and therefore can be of importance to law enforcement officers, special agents, and
18 intelligence components.

19 6. Although each individual Hells Angels charter has a degree of autonomy, there are many
20 similarities among Hells Angels charters within the United States and across the world. In fact, the Hells
21 Angels display a greater degree of uniformity than other OMGs. Thus, the information I gather through
22 these exchanges with law enforcement officers, special agents, and intelligence components across the
23 world can often be applied to understand the actions of other Hells Angels members, prospects,
24 hangarounds, and associates in different geographic locations.

25 7. In addition to participating in criminal investigations, I also develop intelligence about
26 OMGs and their supporters by attending and working OMG events, such as parties and runs. I have
27 attended hundreds of OMG events. Since 2008, I have worked the annual Hells Angels USA Run. Since
28

2006, I have worked the Sturgis Bike Rally; Myrtle Beach Bike Week; Virginia Beach Bike Week; and numerous other events sponsored by organizations including the Hells Angels, Pagan's, Mongols, Outlaws, Bandidos, Iron Horsemen, and Wheels of Soul. I have attended over 50 events sponsored by the Hells Angels.

8. When monitoring OMG events, I assist local law enforcement officers in collecting and analyzing information about attendees, who are frequently members of OMGs. Before the events, I often brief law enforcement officers on the history of the OMG sponsoring the event, the OMG members they might interact with, and any recent acts of violence that the OMG has been involved in (either as victims or perpetrators). A common topic of briefing is whether there has been any recent violence between the OMG and any adversarial OMGs in the area.

9. During the events, I conduct overt surveillance by observing, identifying, and photographing OMG members, prospects, hangarounds, and associates. During these events, I also speak to OMG members, prospects, hangarounds, and associates. I look for new members and members who may be wearing different insignias. Because of the length of time that I have been monitoring OMG events, I can often spot new OMG members or members who are displaying new visual identifiers, such as patches, tags, "flash," pins, or tattoos. When I see an OMG member who is displaying new visual identifiers, I try to determine what the identifiers may represent by speaking with law enforcement officers from that member's city. As explained in more detail below, those visual identifiers can often represent a specific act that a member has committed for his organization.

10. During OMG events, I also help staff the event's command center, where I analyze information being provided by other law enforcement officers conducting overt and covert surveillance, such as photographs or investigative reports documenting the officers' interactions with OMG members. When law enforcement officers or special agents conduct enforcement actions—such as traffic stops or intervening in violent altercations—they share the information they learn with me. For example, they may report the names of those involved in the altercation, what the OMG members said when interviewed, what weapons the OMG members may have been carrying, and what visual identifiers the OMG members were wearing.

1 11. During Hells Angels events, including the Hells Angels USA Runs, I also sometimes
2 attend meetings with representatives of the Hells Angels and representatives from local law
3 enforcement. At those meetings, I speak with Hells Angels members about their plans for the event.

4 12. I am often called upon by ATF for expert analysis. Since 2009, ATF Office of Strategic
5 Intelligence and Information (OSII) has deemed me an expert on OMGs. In my capacity as an IOS, I
6 routinely attend and conduct training at national and international conferences and symposiums about
7 OMGs. Routinely, the topics include trends and patterns, OMG involvement in criminal investigations,
8 OMG violence and patches/tags/tabs, OMG recruitment, OMG support clubs, OMGs and their spouses,
9 and OMGs in the military. Often, former members of an OMG are present, and I have the opportunity to
10 informally debrief them. Through these conferences and symposiums, I also speak to OMG experts from
11 across the globe.

12 13. I have been involved in investigations that led to the following federal prosecutions:

- 13 • *United States v. Lahey et al*, 10-CR-765 (SDNY) and *United States v. Ebeling et al*, 10-CR-606
14 (EDNY): investigation into Pagan's Motorcycle Club
15 • *United States v. Bifield et al*, 12-CR-430 (DSC): investigation into Hells Angels Motorcycle
16 Club
17 • *United States v. Rosga et al*, 10-CR-170 (EDVA): investigation into Mongols Motorcycle Club
18 and Outlaws Motorcycle Club.

19 14. Through my involvement in these and other investigations, I have listened to jail calls
20 and wire intercepts, reviewed post-arrest statements, debriefed confidential informants, analyzed
21 evidence, and reviewed documents seized from members of OMGs. I also regularly review newspaper
22 articles related to OMG violence and OMG investigations, and I regularly speak with other law
23 enforcement officers about ongoing and completed OMG investigations across the world. Other law
24 enforcement officers share investigative reports and seized evidence with me, and update me on relevant
25 events involving OMGs. Between my work for investigations, and my participation in monitoring OMG
26 events, I have spoken with hundreds of OMG members, hangarounds, associates, and prospects.
27 Because I regularly attend Hells Angels events, I have spoken to hundreds of Hells Angels members,
28

prospects, hangarounds, and associates.

15. As a general matter, my opinions about the Hells Angels do not come from a single source, a single conversation with another law enforcement officers or Hells Angel member, a single document, or a single event. Instead, my opinions have been developed through my years of experience investigating, analyzing, and monitoring OMGs. When I learn new intelligence, my evaluation of the accuracy, meaning, significance of that intelligence is informed by my body of knowledge about the Hells Angels. For example, I have listed below a series of violent confrontations between members of the Hells Angels and other adversarial OMGs. Although I may have learned about the existence of a specific act of violence from monitoring an event, an ongoing investigation, or newspaper articles/police reports, my opinion of what that act of violence means and why that act happened is based on my knowledge of the Hells Angels. When I have conversations with other law enforcement officers and intelligence assets about their investigations of the Hells Angels, I evaluate what they have learned against the backdrop of what I know from other investigations. When I review internal Hells Angels documents, I evaluate whether those documents are consistent with what I observe at Hells Angels events, what I have learned from Hells Angels investigations, and what I know from my conversations with witnesses and confidential informants.

16. Based on my conversations with other law enforcement officers, special agents, and intelligence components, including officers, special agents, and intelligence components who are experts on OMGs such as the Hells Angels, I believe that other professionals develop their knowledge about the Hells Angels the same way that I have: they review evidence from Hells Angels investigations and prosecutions; read internal Hells Angels documents; read books authored by and about the Hells Angels; speak with other investigating officers; and observe events happening in real time.

17. Investigating one OMG is often a useful way to develop information about their adversaries. There are several reasons for this. First, as explained below, sometimes violent acts by an OMG appear to be in retaliation for a specific incident or territorial encroachment by an adversary. Second, law enforcement officers, special agents, and intelligence components find it useful to compare and contrast the practices of OMGs, including their recruitment processes, territorial expansion, or

1 involvement in recent criminal activity. Third, members of OMGs may know about the practices of their
2 adversaries.

3 18. The subject of my declaration is Hells Angels **symbols, terms, and territory**. Because
4 the history and structure of the Hells Angels is relevant to understanding the Hells Angels symbols,
5 terms, and territory, I discuss those briefly as well.

6 **Hells Angels History**

7 19. The OMG experience began in the United States in the 1940s, after the end of World War
8 II. A segment of American veterans returned home and missed some of the aspects of the wartime
9 military. They began riding motorcycles in groups to have the sense of adventure and camaraderie.

10 20. The first charter of the Hells Angels Motorcycle Club (HAMC) was established on
11 March 17, 1948, in Fontana/San Bernardino, CA (Berdo). In 1954, the HAMC San Francisco (Frisco)
12 Charter was formed, and in 1957, the HAMC Oakland Charter was formed. Under the direction of
13 Sonny Barger, these three HAMC charters, as well as Southern California (So Cal), formed the Hells
14 Angels Motorcycle Club in the late 1950s.

15 21. I know about the history of the Hells Angels because it has been documented by the Hells
16 Angels in “The Definitive History: Evolution of the Hells Angels Motorcycle Club Insignia and
17 Corporation” (Exhibit 2) and on the Hells Angels website. The history of the Hells Angels has also been
18 documented by Sonny Barger (who, as a founding member, is one of the most famous Hells Angels) in
19 *Hells Angel: The Life and Times of Sonny Barger and the Hells Angels Motorcycle Club* (2001).

20 **Hells Angels Structure and Rules**

21 22. The HAMC is a global organization. The Hells Angels Motorcycle Corporation (referred
22 to as World Corporation) is a non-profit organization that owns all HAMC-related trademarks and
23 intellectual property. The HAMC is managed by a Board of Directors who are elected by HAMC
24 members.

25 23. The HAMC has a set of written rules called the HAMC World Rules. Exhibit 3.

26 24. The HAMC World Rules are outlined into a bounded book and are distributed to each
27 HAMC charter worldwide. Each charter is issued a Rule Book with its number on it. The number
28

corresponds with the order in which the charter was established. For example, Berdoo is Number 1 and San Francisco is Number 2. Every five years, the book is updated.

25. The 2017 World Rules are broken up into 10 parts: “Constitutional Rules”; “Riding Rules”; “Prohibitive Rules”; “Standard Rules”; “Organizational Rules”; “Admission Rules”; “Voting Rules”; “Internet Rules”; “Corporation Rules”; and “Prospect Rules.” The 2017 World Rules also describe Hells Angels traditions, the Death Head patch, and the Hells Angels History.

26. According to the HAMC World Rules, “[t]he World Rules must always be followed, but any country, state or charter can make their own stricter rules.” Exhibit 3 at EXPERT-00000225. In other words, the HAMC World Rules provide for a degree of autonomy at local levels—and particularly, at the charter level—even though they set out rules for the entire organization.

27. Based on my involvement in Hells Angels investigations; conversations with other law enforcement officers, special agents, and intelligence components; conversations with OMG members, prospects, hangarounds, and associates; and observations from attending and monitoring OMG events, I believe that the HAMC World Rules are generally followed by individual charters. (There are exceptions, but to my knowledge, those exceptions are rare.)

HAMC Symbols

28. Members of motorcycle clubs, including OMGs, frequently identify themselves through wearing “patches” (or “rockers”) on their “cuts” (or vests). Taken together, a member’s patches are referred to as his “colors.”

The Death Head

29. The original patch worn by members of the HAMC designed in 1948 was a small design with a skull, helmet and two wings for its membership’s insignia, nicknamed the bumblebee patch. It consisted of a winged skull with an aviator’s cap that resembled a bumblebee.



The Original Death Head

30. In 1948, the HAMC Berdoo members' back patch consisted of an upper patch, or rocker, stating Hells Angels, the original winged skull in the center, and the word "Berdoo" in the bottom rocker. The selection of the colors red and white is from the World War II Hells Angels Third Present Squadron, which had a red-colored silhouette of a female with a halo and white wings.

31. In 1959, a detailed winged skull with an aviator's cap became the HAMC back patch and was named the "Death Head." While Barger was the president of the Oakland charter in 1959, he created a new "Death Head," referred to as the Barger Larger Death Head design. It was larger than the original; it had a single wing and two sets of eight feather tips along the bottom.



The Barger Larger Death Head

32. In 1983, the "Fuki Death Head" was created to help eliminate the natural variations in handmade patches. The new Death Head had 17 points along the bottom border, one more than the Larger Barger Death Head.



The Fuki Death Head

33. In order to standardize the brand in the United States, the HAMC created the standard back patch layout in 1983. During a world meeting in 1990, members decided that every member would wear the same patch based on the 1983 patch layout version, along with the Fuki Death Head. The new

1 world patch was created on behalf of the HAMC of the United States, Inc., and the World Corporation
2 owns all rights, title and interest of the patch. Only licensed vendors were permitted to create the
3 embroidered patches. The Death Head's mouth is stitched shut indicating, "We don't discuss club
4 business."

5 34. I know about the history of the Hells Angels Death Head because it has been documented
6 by the Hells Angels in "The Definitive History: Evolution of the Hells Angels Motorcycle Club Insignia
7 and Corporation." Exhibit 2.

8 35. I believe that the stitched-shut mouth means "We don't discuss club business" because of
9 the secrecy to which the Hells Angels try to adhere. The stitched-shut mouth is also consistent with the
10 Hells Angels rules, which condemn cooperation with law enforcement: "No undesirables in the club!
11 For example: No snitches, junkies, cops or ex-cops, etc. Membership shall be limited to men who are
12 not and have never chosen to belong to, or worked with any law enforcement agency or authority which
13 has the power of arrest or incarceration." Exhibit 3 at EXPERT-000000204. In addition, the World
14 Rules prohibit Hells Angels members from "put[ting] official World Run photos on internet sites" or
15 putting "party photos or pictures of Brothers on internet sites without those Brothers permission."
16 Exhibit 3 at EXPERT-00000229.

17 36. The meaning of the stitched-shut mouth is also consistent with the secrecy imposed by
18 some of the individual charter bylaws. For example, the Modesto charter rules say "no phones, tablets,
19 or any electronic devices in church" and that "[a]ll charter business will remain in the room and not
20 outside the charter-on the carpet." Exhibit 4.

21 37. In his book, Barger condemned cooperation with law enforcement in a chapter he titled
22 "Rats, Infil-traitors, and Government Informants." He wrote: "[t]here's nobody lower in this world than
23 someone who rats on our club . . . and that includes Anthony Tait." Barger at 229. Consistent with this
24 statement, law enforcement officers, special agents, and intelligence components frequently discuss the
25 difficulty of cultivating sources within the Hells Angels.

26 38. I also know of examples where Hells Angels members have committed violence against
27 witnesses or those that cooperate with law enforcement. In 2014, Adam Lee Hall (a member of the
28

1 Berkshire County Hells Angels) was sentenced to three life terms for kidnapping and murdering three
2 men. One of the victims was scheduled to testify against Hall. WAMC, *Mass. Man Gets 3 Life Terms in*
3 *Triple Slaying*, available at <https://www.wamc.org/post/mass-man-gets-3-life-terms-triple-slaying> (last
4 accessed June 27, 2020).

5 39. The Death Head is central to the HAMC. Only a member can don the Death Head on his
6 colors, soft colors, belt buckle, belts, t-shirts or any clothing. Hells Angels members are protective of the
7 Hells Angels' patch and Death Head, to extent that they are willing to engage in violence to assert
8 ownership and control over these symbols. No charter, HAMC member or HAMC prospect is allowed to
9 market anything bearing the names Hells Angels and/or Death Head logo without proper licensing by
10 the corporation. I know the Hells Angels' licensing rules because their rulebook states that "[n]o HAMC
11 charter, HAMC Member, or HAMC Prospect be allowed to market anything bearing the name Hells
12 Angels and/or our Death Head logo without proper licensing by the corporation." Exhibit 3 at EXPERT-
13 00000229.

14 40. Within the OMG and motorcycle club underworld, the Death Head represents violence
15 and a mantra of living by a different set of rules and behaviors. The trademarked name Hells Angels
16 and Death Head logo demand respect from other OMGs, motorcycle clubs, and others. Anyone or
17 anything that opposes or disrespects a member or the colors is subject to the wrath of the HAMC,
18 including being subject to violence. Once a member receives his colors, he is accepted as a brother at
19 any HAMC charter across the globe. By placing the Death Head on his back, a member represents
20 approximately 5,000 members from across the world who share a common set of goals and traits.

21 41. I believe that the Death Head is central to the HAMC because of the emphasis placed on
22 the Death Head by the Hells Angels.

23 42. In their memoirs, former Hells Angels have explained the importance of the Death Head.
24 For example, George Wethern is the former Vice President of the Hells Angels Oakland chapter. In his
25 book Wethern wrote: "[R]espect for club property, namely anything bearing the death's head or club
26 name, was a rigid tenet." Wethern, *A Wayward Angel: The Full Story of the Hells Angels* 96 (2004).

27 43. Barger wrote: "Patches do not belong to members; they belong to the club (now a
28

corporation). We've had a lot of problems with that distinction when informants and rats give over their patches to the cops . . . According to our bylaws, a patch remains club property, but we generally don't get patches back from rats." Barger at 43. Barger also wrote about an incident that shows the importance of the Hells Angels' patch to the Hells Angels: "Around the same time there was another hassle between Oakland and another motorcycle club. We didn't shoot or stab anybody, but anytime we saw any of their members, we'd fuck 'em up, then cut their patches off with hunting knives. Snatching somebody else's patch is a serious act of battle . . . Any Hell's Angel forced to give up his patch without fighting for it is automatically voted out of the club." Barger at 149.

44. The Hells Angels' rules emphasize the importance of the Death Head. The World Rules display the Death Head logo and make clear that the Hells Angels consider anything displaying the Death Head to be the property of the organization as a whole. The World Rules contain the following rules restricting the use of the Death Head:

- "Only Hells Angels will possess Hells Angels paraphernalia. (No ex-Member or Prospect is allowed to keep any type of Club property or indicia.)"
- "No HAMC charter, HAMC Member, or HAMC Prospect be allowed to market anything bearing the name Hells Angels and/or our Death Head logo without proper licensing by the corporation."
- "ALL support gear (shirts, hats, rings, key chains, anything) MUST say 'support' with the number 81 and must NOT have indicia that closely resembles our own (i.e. rockers, Death Heads and layout)."
- "Only Members can ride a motorcycle with Hells Angels insignia, except in extenuating circumstances."
- "Prospects must not use the words Hells Angels or Death Heads on Christmas or Anniversary card."
- "No charter or Member can use a Death Head on any public party flyer, memorial card, run program or poster that is given away to the public or displayed in a manner that is obtained by the public."

Exhibit 3.

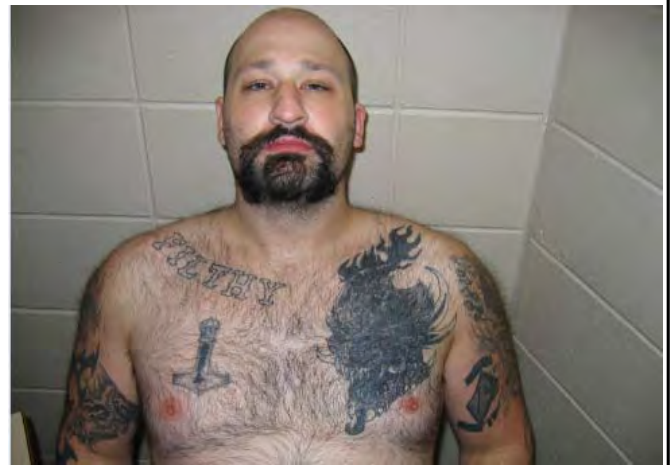
45. As described above, I have been to hundreds of events at which Hells Angels have been present and have viewed thousands of photographs of Hells Angels members. Every Hells Angels cut that I have seen displays the Death Head.

46. I also know the Hells Angels to act in other ways that demonstrate the importance of the Death Head. Some charters make their members sign Corporate Property Agreements. These agreements state that the Hells Angels mark and the Death Head logo belong solely to the Hells Angels Motorcycle Corporation, and that any items bearing the Hells Angels mark and the Death Head logo (including motorcycles and clothing) “are the sole and legal property of HAMC Corp.” Exhibit 5.

47. Because the Hells Angels consider the Death Head to be the property of the Hells Angels, non-members are not permitted display the design. This prohibition extends to tattoos. So, when a Hells Angels member leaves the organization, he must generally cover up his Hells Angels tattoo or note when he left the organization. This process is mandated by the World Rules: “The charter has to ensure that the Out-persons tattoos are covered or removed.” Exhibit 3 at EXPERT-00000233.

48. I know of at least one charter that required members to sign a consent form that acknowledged that he was “no longer a member of HAMC, and as an ex-member . . . was not entitled to wear or display any tattoos that would identify [him] as a member of HAMC.” Exhibit 6.

49. I have viewed photographs of former HAMC members who have covered their Death
Head or other Hells Angels tattoos (or have had their tattoos covered by others).



50. I believe that the Death Head represents violence for several reasons. First, the Hells Angels have a long history of violence. Sonny Barger has described the violent culture of the Hells Angels in his autobiography. In *Hells Angels: The Autobiography of Sonny Barger*, Barger wrote:

Fuck with a Hell's Angel and if the guy doesn't light you up, he could be tossed out of the club for not standing up for himself. No second chances. Members are routinely voted out of the club – and beaten up – if they don't stand up for themselves. . . We take such a hard line because if a Hell's Angel is out in public by himself and somebody insults him or rat-packs him, we expect him to stand up for himself (and the club's reputation) and not just walk away. Light the guy up, fine. If you get beat up, you get beat up. But never take an insult. If the guy fucks you up, your friends can always return and rectify the situation. These rules apply all the times, whether you're with other Hell's Angels or on your own. If you can't stand up for yourself in front of other members, how can we be sure you'll stand up when you're alone? Angels don't like to make too many rules, but a few basics have kept the club in operation for over fifty years.

Barger at 71.

51. Sonny Barger also described an incident where he and other Hells Angels beat members of a different motorcycle club called the Unknown because an Unknown prospect stole his motorcycle: “We rounded up everybody who was responsible, tied them up, and took them over to my house on Golf Links Road. . . When we found the last guy the punishment began. One at a time we bullwhipped them and beat them with spiked dog collars, broke their fingers with ball peen hammers. One of them screamed at us, ‘Why don't you just kill us and get it over with?’ . . . Moral of the story—don't get caught stealing a Hell's Angel's bike, especially if it's the president's.” Barger at 65.

52. Barger's descriptions are consistent with Hells Angels' long-running and violent feuds with other adversarial motorcycle gangs. Since the 1970s, the Hells Angels have been involved in a series of violent confrontations with the Mongols Motorcycle Club. One of the most famous such incidents was the “River Run Riot” in Laughlin, Nevada in which three people were killed. The Hells Angels have also been involved in violent feuds with the Pagan's Motorcycle Club, Outlaws Motorcycle Club, and Bandidos Motorcycle Club. At OMG runs and events, law enforcement officers, special agents, and intelligence components discuss recent violent acts between the OMGs in order to determine the likelihood of violence at the event.

53. The riot at Laughlin between the Hells Angels and the Mongols is famous within the OMG community, particularly within the Hells Angels. Although Hells Angels were killed in the

1 fighting, it raised the profile of the club nationally, and it resulted in increased recruiting for new
2 members. It demonstrated that the Hells Angels are willing to take action and engage in violence against
3 their rivals. Raymond Foakes became famous as the Hells Angel who started the riot. Other Hells
4 Angels admire him as someone who is a “real Hells Angel” in that he is willing to defend the Hells
5 Angels colors and fight for the honor of the Hells Angels. I know this because I have watched the
6 footage of the riot. I have spoken with a number of current and former Hells Angels members and
7 associates about Laughlin and about Foakes, and I have discussed Laughlin and Foakes with many law
8 enforcement officers, special agents, and intelligence components. In fact, Foakes’s role within the Hells
9 Angels is so prominent that I have had a number of conversations about him, but I have never seen him
10 at any of the Hells Angels events and runs that I have attended. This is likely because he has been in
11 custody so frequently after 2009.

12 54. The violence between the Hells Angels and adversarial motorcycle groups, particularly
13 on the East Coast and in Canada, was documented extensively by Yves Lavigne in *Hells Angels: Three*
14 *Can Keep A Secret if Two Are Dead*.

15 55. I also know that the Hells Angels circulates a “Big House List” and a “Big House Crew”
16 newsletter that shows every Hells Angels member who has been incarcerated, and I have seen this list
17 among seized Hells Angels documents. Exhibit 7. This list also leads me to believe that Hells Angels
18 know that violence is part of their organization—many of the members on the Big House List were
19 incarcerated for acts of violence. Similarly, the Modesto charter’s rules provide for a “100\$ a month
20 allowance for members or anyone with status incarcerated.” Exhibit 4. The Hells Angels frequently take
21 care of prospects and members who have been incarcerated. I believe that this is so that they have
22 reduced incentives to cooperate with law enforcement. I have spoken with Hells Angels members,
23 prospects, hangarounds, and associates about the Big House List, and the Hells Angels’ ability to take
24 care of those who are incarcerated. I have also spoken to members and associates of other OMGs, who
25 sometimes reference the Hells Angels as having a greater tendency to take care of their members and
26 prospects than their own organization.

The Four-Piece Back Patch

56. In the United States, HAMC members wear a four-piece back patch. The top rocker states “Hells Angels,” the center patch is the Death Head, the word “MC” is on the bottom right of the Death Head, and the bottom rocker is always the state. All 94 charters in the United States don a state on the bottom rocker.



57. I know about the appearance of the Hells Angels colors because I have attended hundreds of events at which members of the Hells Angels have been present. I have also reviewed thousands of photographs of Hells Angels members wearing their colors. The appearance of the Hells Angels back patch is also mandated by the HAMC World Rules, which state that “[t]here will be nothing on the back of the patch except the colors, which is HELLS ANGELS, DEATH HEAD, MC, and COUNTRY/STATE/CHARTER.” Exhibit 3 at EXPERT-00000231. I am not aware of any instance in the United States in which this rule was not followed. (I am aware of an exception to this rule in Australia. At one time, the Australia charter wore a bottom rocker that said “Nomads.”)

58. The “bottom rocker”—which is the state in the United States—represents territory that the Hells Angels claim as their own. I believe that the bottom rocker refers to a claim of territory because I am aware of violent confrontations that the Hells Angels have had with other adversarial OMGs because the other OMG also tried to claim that territory through the bottom rocker.

59. The best known example of this is the Hells Angels long-running feud with the Mongols. By the mid-1970s, the HAMC was the dominant OMG in California, and HAMC claimed the sole right to display the California bottom rocker. In their view, any other motorcycle club that wished to display

1 this territory on their own bottom rockers would have to obtain the permission of HAMC in order to do
2 so. At the same time, however, the Vagos, Mongols, and an assortment of smaller OMGs and
3 motorcycle clubs were vying for the right to wear the California bottom rocker.

4 60. By 1977, the Mongols had been warned on numerous occasions not to wear a three- piece
5 patch with the California bottom rocker. On September 5, 1977, a pack of Mongols was returning home
6 from a national run when two members and their spouses were shot off their motorcycles in San Diego
7 County, California. Both Mongols were killed, and their spouses were wounded. During their funeral
8 service on September 9, 1977, a vehicle parked near the mortuary building where the services were
9 being held. The driver exited the vehicle, delivered a wreath of red and white colors, and then exited the
10 building. After he left the property, a car bomb detonated, causing no deaths, but people were injured
11 from the shrapnel. Four HAMC members pleaded guilty to racketeering for their role in the homicides
12 and bombing. Violence between the HAMC and the Mongols has continued, as both entities fought for
13 control over territory, particularly California. Exhibit 17.

14 61. The feud between the Hells Angels and Mongols has also been described the same way—
15 specifically, becoming more violent due to the Mongols’ use of the California bottom rocker—by
16 members of the Mongols and the Hells Angels. Former Mongols International President Ruben “Doc”
17 Cavazos explained the feud worsened because of the Mongols’ use of the California bottom rocker in a
18 *Gangland* interview.¹ Former Hells Angel George Christie described the same thing. Specifically,
19 Christie wrote: “A few months after the fight, the Mongols decided they were ready to challenge us.
20 Their leader informed us they too would soon be wearing the California state rocker—the patch we wore
21 to show our preeminence in the state. The outlaw world is all about respect and territory; this was clearly
22 a challenge that would have to be addressed.” George Christie, *I was A Hells Angel for 40 Years. This is*
23 *the One Time I Doubted the Outlaw Lifestyle*, available at [https://narratively.com/i-was-a-hells-angel-](https://narratively.com/i-was-a-hells-angel-for-40-years-this-is-the-one-time-i-doubted-the-outlaw-lifestyle/)
24 [for-40-years-this-is-the-one-time-i-doubted-the-outlaw-lifestyle/](https://narratively.com/i-was-a-hells-angel-for-40-years-this-is-the-one-time-i-doubted-the-outlaw-lifestyle/) (last accessed June 27, 2020).

25 62. The back-and-forth violence between the Mongols and Hells Angels has continued to the
26

27
28 ¹ The interview is available on Youtube at https://www.youtube.com/watch?v=8xlynByOB_4 (last accessed June 27, 2020).

present day. Because of this history, members of each organization can expect violence at the hands of the other—even if that person has not personally been around the other OMG. Members of each organization are also expected to be prepared to carry out violence against the other. This is evident from how long this feud has lasted, and how far geographically it has spanned. Even though the feud originated in California in the early-to-mid 1970s, there are still violent acts transpiring between the two OMGs across the United States and Europe. I believe there is no other way to explain the consistency and geographic and temporal scope of the violence involving members of the two OMGs, other than this historical feud.

63. HAMC members use their colors to intend to intimidate other OMGs and the public. During runs, they travel as a group, often parading through the streets to demonstrate their territorial control over a State, city or region. I have personally observed these “power runs.” In 2019, for example, I saw a group of HAMC members, while wearing their colors, ride past a tattoo parlor owned a member of the Mongols Motorcycle Club. Because of the long history of violence between the Hells Angels and Mongols, I believe this run was intended to intimidate the Mongols member.

Tags

64. In addition to the back patches, Hells Angels colors also feature patches on the front, referred to as “tags” or “flash.”

65. The **Filthy Few** tag means a member or prospect has committed an act of violence in furtherance of the organization. To my knowledge, only violent acts result in a Filthy Few tag. (However, there are Hells Angels members who wear the Filthy Few tag, flash, or tattoo, and I am unaware of how they earned it.) If a prospect commits an act of violence, he must wait until he receives his full patch to don the Filthy Few as a tag, flash, or tattoo. It can be awarded for committing a murder, assault, or a beating. A member can wear the Filthy Few as a tag or side rocker. It can also be displayed on the gas tank of a Filthy Few member. The killing or violent act has to be witnessed by another member, and one can only receive the tag from another Filthy Few member. If you are a member of the Filthy Few, you can be called upon to commit additional violent acts, which is depicted with “666” in the middle.

66. I know the Filthy Few tag exists because I've seen Hells Angels members wearing it. I know what the Filthy Few tag means because I've talked to other law enforcement officers, special agents, intelligence components, and sources of information about the meaning of the tag. For example, I have spoken with ATF Special Agent and former Outlaws member Daniel Ozbolt about the meaning of the Filthy Few patch. As an ATF Special Agent, Ozbolt infiltrated both the Mongols and the Outlaws. What he told me—that the tag means that a member or prospect has committed an act of violence in furtherance of the club—matches what I've observed. Specifically, I've observed former HAMC member Ray Dwyer with the Filthy Few tag, and I know that Dwyer committed acts of violence during the Hellraisers Ball Brawl in 2002. Dwyer fired into a crowd during the brawl and was first charged with murder, but later pled guilty to a weapons possession charge. New York Times, *Murder Charges Are Dropped in Motorcycle Gang Fight*, available at <https://www.nytimes.com/2002/09/20/nyregion/murder-charges-are-dropped-in-motorcycle-gang-fight.html> (last accessed June 29, 2020). I have seen photographs of Dwyer prior to 2002 during which he was not wearing the Filthy Few tag. Therefore, I believe he earned the Filthy Few tag for his role in the Hellraisers Ball Brawl.

67. In addition, I've also observed former HAMC member Milo Campbell wearing the Filthy Few tag, and I know that Campbell committed acts of violence during the 2008 Sturgis Motorcycle Rally, when he got into a fight with members of the Iron Pigs Motorcycle Club. Exhibit 8. Thus, I believe that he earned the Filthy Few tag for his role in the fight during the 2008 Sturgis Motorcycle Rally.

68. The Filthy Few tag was described the same way in *Three Can Keep A Secret if Two are Dead* by Yves Lavigne. In describing a series of violent acts between the Hells Angels and Outlaws in Canada, Lavigne reported that the Filthy Few status meant the member had shown “a display of courage.” Lavigne at 334. Lavigne reported that John Miller, a member of the Bridgeport, Connecticut Hells Angels, was responsible for issuing Filthy Few patches in the early 1980s and said: “I’d keep a stack of Filthy Few patches for the crazy Canadians. They’d come down here and tell us how many Outlaws they killed. ‘I killed an Outlaw. Give me a Filthy Few patch.’”

69. The Filthy Few tag is also consistent with the Hells Angels' violent culture, as described above.

70. The **Dequaillo** tag means a member assaulted a law enforcement entity (on or off duty), someone who has arrest powers (such as military police or park ranger), or a member of a law enforcement motorcycle club. For example, if a member resists arrest or assaults a member of law enforcement in a drinking establishment, he is bestowed a Dequaillo tag. Similar to the Filthy Few tag, the act must be witnessed by a fellow HAMC member of prospect.

71. I know what the Dequaillo tag means because I've talked to other law enforcement officers and confidential informants about the meaning of the tag. What they've told me—that the tag means that an HAMC member assaulted a law enforcement officer—matches what I've observed. Specifically, I've observed former HAMC member Milo Campbell wearing the Dequaillo tag, and I know that Campbell committed acts of violence during the 2008 Sturgis Motorcycle Rally, when he got into a fight with members of the Iron Pigs Motorcycle Club. The Iron Pigs Motorcycle Club's membership includes a number of law enforcement officers, prison guards, and firefighters. Exhibit 8. I have seen photographs of Campbell prior to 2008 during which he was not wearing the Dequaillo tag. Thus, I have concluded that he earned the Dequaillo tag for his role in the fight during the 2008 Sturgis Motorcycle Rally.

72. This meaning of the Dequaillo tag is also consistent with what I know about Hells Angels members Michael Garner, Timothy Moore, William Italiano, Guide Venezia, Mark Guardado Sr., Mark McKenna, Ed Shaunessy, and James Costin. I have viewed photographs of them wearing the Dequaillo tag, and I know that they were involved in a riot at Laconia Bicycle Week in June 1998 in which several police officers were assaulted. Bangor Daily News, *3 Maine Hell's Angels sentenced in rioting*, available at <https://archive.bangordailynews.com/1999/05/19/3-maine-hells-angels-sentenced-in-rioting/> (last accessed June 27, 2020).

73. The **Purple Heart** pin is awarded to any member who has given his blood in the defense and honor of the HAMC. It also means a conflict resulting in injury by a weapon. The Purple Heart pin is another avenue for a member to display his propensity to be involved in a violent conflict in

furtherance of the HAMC, even if he is stabbed, shot or brutally assaulted.

74. I know that the “Purple Heart” pin exists because I have seen it on a number of Hells Angels at events. I have also seen Purple Hearts displayed as tattoos. I know what the pin means because I have reviewed a flyer created by the Oakland chapter of the Hells Angels, which states that “any member who has earned the Deathhead Purple Heart has given his blood, in the defense and honor of the Hells Angels Motorcycle Club and shall forever be revered by his fellow members.” Exhibit 9.

75. There are other tags that are used by various charters as well, including tags denoting the specific charter to which the member belongs within the territory claimed through the back bottom rocker, and tags indicating status as an officer within that charter.

Hells Angels Terms

76. **Charter:** The basic organizational unit of the HAMC is the charter, which is operated out of a city or county. All charters report to the higher levels of the organization at the regional, national, and world level. This formula is present across the globe. In the United States, there are 99 charters, which are divided into two executive groups: the West Coast and East Coast. The West Coast is composed of all charters west of Denver, Colorado. The East Coast is composed of all charters east of Omaha, Nebraska.

77. Once a group becomes an official charter, they receive a certificate from World Corporation, and they agree to abide by the bylaws, rules and regulations of the HAMC. Exhibit 10.

78. HAMC charters have a vertical structure. Although each member is able to vote on charter decisions, each charter also has its own executive committee, which is usually elected once a year by a majority of votes of full-patch members. A typical Hells Angels charter includes a minimum of six full-patch members. All members have a say in club-related decisions through a vote in a one-man-one-vote system; however, due to the hierarchical nature of this organization, the president has the final say with his veto powers.

79. According to the Hells Angels World Rules, six members are required for the charter to operate and remain functional. Exhibit 2. However, I am aware of exceptions to this rule. In 1994, the Hells Angels from South Africa split the Johannesburg charter and formed the West Rand charter with

1 less than six members.

2 80. The World Rules also set forth the “one man one vote” system. Exhibit 3.

3 81. Charters act relatively autonomously in their day-to-day activities. They have their own
4 rules, although those rules cannot supersede state, country, or world rules.

5 82. I have seen many versions of individual charter bylaws. The bylaws regulate different
6 topics, which reinforces my belief that charter autonomy exists. For example, the HAMC Berdoo,
7 HAMC Modesto, and HAMC Fresno bylaws all set out different rules and establish different fines for
8 violating those rules.

9 83. In addition, the Hells Angels World Rules repeatedly reference charter autonomy:
10 “[c]harter autonomy is a basic right but cannot supersede any World Rule,” Exhibit 2 at EXPERT-
11 00000227; “[a]ll countries have charter autonomy concerning riding rules and motorcycling”; “[c]harter
12 autonomy decides if a person is LEFT.” Exhibit 3 at EXPERT-00000232.

13 84. Consistent with the rules, I have also observed that there are differences in how charters
14 operate. Some of those differences appear in how charters present themselves visually. Some charters
15 wear nothing on the front of their vests; other charters have patches on the front of their vests. Some
16 differences also exist in how charters govern themselves. For instance, I know that the Cleveland Hells
17 Angels charter elects a new president every year, whereas other charters may keep the same president
18 for many years.

19 85. At the same time, there are also significant similarities between charters, and my
20 experience leads me to conclude that the charters believe themselves bound together as part of a single
21 organization with the same values and culture. Some of those similarities are apparent from the Hells
22 Angels symbols and terms. For example, the World Rules specify that all Hells Angels members must
23 wear the same “computer design style patch,” and “[t]here will be nothing on the back of the patch
24 except the colors, which is HELLS ANGELS, DEATH HEAD, MC, and
25 COUNTRY/STATE/CHARTER.” Exhibit 3 at EXPERT-00000231. At the events I have worked, I have
26 never seen any Hells Angel depart from these conventions mandated by the World Rules. (I am aware of
27 other examples of noncompliance with the World Rules, but to my knowledge, these examples are rare.)
28

1 86. In addition, the World Rules say that “[a]ll Members and Prospects must ride a
2 motorcycle no less than 750 cubic centimeters.” Exhibit 3 at EXPERT-00000227. I have attended
3 hundreds of events where Hells Angels were present, and I have never known a Hells Angel Member or
4 Prospect to ride a smaller motorcycle.

5 87. In addition, the World Rules say that “[i]f a member is OUT, the charter he used to
6 belong to must send a recent picture of him to all World Charters.” Exhibit 3 at EXPERT-00000231. I
7 have reviewed “Out” slips that list members who are “Out” of the club from at least twenty charters.
8 I’ve included a few examples as Exhibit 11. Individual charters also send prospects’ information to the
9 entire organization. The fact that Hells Angels charters send “prospect” and “out” information to all
10 other charters also suggests that individual charters believe themselves to be part of a single
11 organization—they are informing the rest of the organization of charter-level decisions. Moreover, the
12 “Big House List” includes incarcerated members from all charters, which further shows that the charters
13 believe they share a common interest—supporting incarcerated Hells Angels, regardless of the specific
14 charter to which they belong.

15 88. I believe that charters are bound by decisions made at the higher levels of the HAMC
16 organization because I have reviewed minutes of World Meetings, East Coast Officers Meetings and
17 West Coast Officers Meetings, and have seen evidence of such decisions. For example, during the June
18 2007 West Coast Officers’ Meeting, the Sonoma County charter submitted a motion (seconded by the
19 Frisco Charter), to expel most of the Shasta County charter members from the club. The July 2007 West
20 Coast Officers’ Meeting minutes note that the Shasta County charter was subsequently “frozen.” Exhibit
21 20. Therefore, I believe that this episode shows that the West Coast controlled the existence of the
22 Shasta County charter.

23 89. I believe that the Hells Angels history of violent conflicts with adversarial OMGs also
24 show that individual charters believe themselves to be part of a single organization. Members of charters
25 carry out violent acts against adversaries that span time and geography, and those violent acts sometimes
26 have no apparent triggering event other than the existence of a historical rivalry. When debriefing
27 former or current Hells Angels members, I frequently speak to them about these traditional rivalries.
28

1 They are aware of who their rivals are and the history of violence between the organizations. Hells
2 Angels members consider OMGs who do not have a presence in the area of their own charter to be rivals
3 if that OMG is a rival of charters in other geographic areas. For example, on August 8, 2006, two Hells
4 Angels named Chad Wilson and John Midmore shot at five Outlaw members and associates during the
5 annual Sturgis Bike Rally. Both Wilson and Midmore are from areas where the Outlaws have a
6 minimal-to-no presence. However, the Hells Angels and Outlaws have been involved in a long-standing
7 feud since 1974. Several months before the Sturgis shooting, Hells Angels Bridgeport President Roger
8 Mariani was shot by a member of the Outlaws. I am not aware of any reason for the Sturgis shooting
9 other than the historical feud between the Hells Angels and the Outlaws.

10 90. As described below, the Hells Angels have expanded throughout the United States. I
11 believe that Hells Angels charters are strategically established to fend off expansion by an adversary or
12 demonstrate control over an area. In his book, Wethern wrote that: "We didn't believe in granting
13 chapters for the sake of growth, nor to provide us with a place to stay when we were on vacation. The
14 additions were designed to contribute to our image and business concerns, by providing a drug route
15 link, manufacturing a drug, supplying chemicals or distributing drugs in an untapped area." Wethern at
16 90. Barger described the value of expansion in similarly strategic terms: "Early on, we decided if we
17 were all going to wear the same patch, we were all going to function under the same rules. To shore up
18 our territory fast, we made up tactical rules early on." Barger at 32.

19 91. Werthern's statements are consistent with what I have observed. I have observed Hells
20 Angels' charters opening up in the area of traditionally adversarial OMGs, and believe that those
21 charters were established to limit the reach of those adversaries. For example, the Hells Angels
22 established Nomads charters in Michigan in 2020 and Virginia in 2010. Those two areas had a
23 significant Outlaws and Pagan's presence at those times. (The Outlaws and Pagan's are historical
24 adversaries of the Hells Angels.) The Hells Angels also recently opened up new charters in Maryland
25 and New Jersey, in areas that have a significant Pagan's presence.

26 92. After the Hells Angels established a Nomads charter in Virginia in 2010, there was
27 violence between the Pagan's, Outlaws, and Hells Angels. ATF undercover officers embedded with the
28

1 Outlaws were involved in an altercation with members of the Hells Angels support club. I believe that
2 this fight occurred because the Pagan's/Outlaws considered that area of Virginia to be their territory and
3 wanted to prevent the Hells Angels from moving in. Exhibit 12.

4 93. Charters are required to have a clubhouse, which must have a working telephone or form
5 of communication, to include a functional email account. If they do not have a functional email address,
6 they are fined for non-compliance. Additionally, operation of any HAMC Website will be the
7 responsibility of the respective HAMC charter, financially, for content and compliance with the HAMC
8 Internet rules. Charters are allowed to establish and maintain a website, but it must be done in the
9 charter's best interest. All charter websites are strictly monitored by the HAMC Webmaster. Exhibit 3.

10 94. The HAMC adopts strict security measures at its clubhouses in the United States to fend
11 off an adversary or intrusion by law enforcement. Cameras are strategically placed to monitor day-to-
12 day foot traffic or intrusion by an unwarranted guest, adversary or law enforcement. Many of their doors
13 and windows are fortified. Often, firearms are easily accessible, as well as an assortment of knives and
14 weapons such as ball peen hammers, ax handles, or bats.

15 95. In *Three Can Keep a Secret*, Yves Lavigne described HAMC clubhouses the following
16 way: "The Hell's Angels learn through experience that a club house is useless against police or enemy
17 biker raids if it isn't heavily fortified. Doors and windows are reinforced with steel plates and shutters or
18 mesh. Many properties—like the clubhouses in Durham, North Carolina, Charleston, South Carolina,
19 and Bridgeport, Connecticut—are surrounded by a chainlink fence topped with barbed wire. Some clubs
20 have cinderblock walls with gunports inside the fence." Lavaigne at 311.

21 96. I have been inside HAMC clubhouses in Vallejo, Denver, and Australia, and viewed the
22 security arrangements in those clubhouses. For example, the Vallejo clubhouse has doors fortified with
23 metal bars and security cameras placed all along the property. I have also viewed photographs of a
24 number of other clubhouses, and viewed photographs of readily-accessible weapons just inside the
25 doorway to those clubhouses. The photograph below was taken during the execution of a search warrant
26 at the San Diego clubhouse. These guns were seized from a container next to the front door.



97. Charters make money in a variety of ways. Primarily, an HAMC charter sells its indicia at local swap meets, motorcycle shows, tattoo conventions, charity runs, and support club functions, as well as at local motorcycle shops/businesses. Some profit from the sales on indicia, such as calendars, goes to the HAMC Corporation.

98. **Church.** Each charter conducts regularly scheduled weekly meetings, referred to as “church.” Strict rules of order are followed, and minutes are taken. These meetings generally take place at the charter’s clubhouse, and attendance at the meeting is primarily restricted to members. Charter meetings mostly concern legitimate activities, such as planning social events, voting in new members, etc. Additionally, charter meetings often involve the discussion of criminal activities – for example, encouraging assault and/or retaliation. If questions concerning criminal activities arise, the utmost security to prevent detection is used. However, they will openly discuss at their meeting if a motorcycle club, support club or adversary is moving into a region or State without permission.

99. During church, members and prospects are often brought up for membership vote or disciplinary actions. Disciplinary actions can be taken for breaking rules, bringing unwarranted law enforcement scrutiny on the HAMC, or not defending the patch in a fight.

100. I have viewed charter rules that require members to attend church. For example, the Fresno County bylaws require members to attend weekly meetings, with a missed meeting punished with a fine of \$25. Exhibit 13. Likewise, the Modesto Bylaws state that “a member must be notified if going to be late to church. If not, a fine will be issued.” Exhibit 4. The Modesto bylaws also suggest that

1 church business should remain secret: they say “no phones, tablets, or any electronic devices in church”
2 and that “[a]ll charter business will remain in the room and not outside the charter- on the carpet.”
3 Exhibit 4.

4 101. I have talked to law enforcement officers, special agents, and intelligence components
5 about “church.” Every charter that I’m aware of holds regular meetings and generally, local law
6 enforcement officers know when a particular charter is holding church.

7 102. **Nomads.** The HAMC also has charters referred to as Nomads charters. A Nomads
8 charter generally does not have a specific location to conduct its criminal activity. Traditionally,
9 Nomads charters do not have clubhouses, as the members within the charter are mobile. In the United
10 States, only one Nomads charter is permitted in each State.

11 103. **Full-patch members, hangarounds, and prospects:** People associated with the Hells
12 Angels are known as hangarounds, prospects, and full-patch members.

13 104. The HAMC has a hierarchical structure, within which individuals hold official positions.
14 First, in order to enter the pipeline to become a member, a member must sponsor a candidate, who is
15 also responsible for the candidate’s behavior. All candidates must furnish personal information to the
16 club, indicating such items as family names, bank information, address, next of kin, spouse, criminal
17 history, and employment. Photographs of the candidate are shared via email to all charters in the United
18 States. Exhibit 14. If there are no negative responses on the candidate, then he can proceed. After a
19 lengthy, phased process, a prospective member is first deemed to be a “**Hangaround**,” indicating the
20 individual is invited to some club events or to meet club members at known gathering places. At the end
21 of that stage, he is elevated to the position of “**Prospect**,” participating in some club activities, but not
22 having voting privileges, while he is evaluated for suitability as a full member. The last phase, and
23 highest membership status, is “**Full Membership**” or “**Full Patch**.” As explained above, the term full
24 patch refers to the complete four-piece crest, including the Death Head logo, two rockers (top rocker:
25 “Hells Angels”; bottom rocker: State or territory claimed), and the rectangular “MC” patch below the
26 wing of the Death Head. In the United States, prospects only wear a bottom rocker with the State.

27 105. **Hangaround.** This term refers to the first phase of HAMC membership. This status
28

1 indicates that the individual is invited to some club events or to meet club members at known gathering
2 places. The “hangaround” does not wear colors. However, a “hangaround” will wear a black and white,
3 or a red and white sponsoring charter patch on the front left breast of his vest. He cannot attend
4 meetings, but guards the surroundings of these meetings to ensure the safety of members attending. The
5 “hangaround” is entirely subservient to all full-fledged members of the charter, including the prospects,
6 and must accomplish what he is ordered. A hangaround who is being considered for potential
7 membership must be sponsored by a full patch member. All candidates must furnish personal
8 information to the club, indicating such items as family names, bank information, address, next of kin,
9 spouse, criminal history, employment, etc. Photographs of the candidate are shared via email to all
10 charters in the United States. If there are no negative responses on the candidate, then he can proceed.
11 The requirements to become a member include possessing a valid driver’s license and having a road-
12 worthy Harley Davidson motorcycle. The prospective member cannot be a child molester or have
13 applied to become a police officer or prison guard. If the prospect took a police test, that is grounds to
14 omit him as a member. (The Hells Angels rules also used to expressly prohibit Black Americans from
15 joining the club. That rule has been removed. However, I am not aware of any current Hells Angels
16 members, prospects, or hangarounds who are Black.)

17 106. **Prospect.** The “prospect” a step closer to full membership in HAMC. A person is
18 elevated in status from a hang-around as he gains the confidence of all color-wearing members of the
19 charter. He has demonstrated loyalty and ability to carry out and obey orders, but he is still in a prospect
20 period as the charter considers him for full membership. He is more closely associated with the HAMC
21 charter than hangarounds or members of the public, but he cannot vote or attend meetings. Prospects can
22 wear the lower rocker showing the club territory and the “MC” badge on the back of his vest. Because
23 they are not Hells Angels members, however, prospects cannot wear the “Hells Angels” or the Death
24 Head patches. Prospects also wear a “prospect” and “charter” badge on the front left side of his vest. The
25 prospect period can last 1 to 2 years, depending on the personality of the individual and his ability to
26 perform club functions, but it is at least a year-long term. A prospect has to receive unanimous approval
27 in a vote by members of the charter in order to become a full member. Prospects are required to pay club
28

1 dues and contribute to the defense fund.

2 107. **Full Patch Member.** After a full year as a prospect and after receiving the unanimous
3 support of the charter, the prospect is finally accepted as a full-patch member. When a member has
4 proven his loyalty to the club, he receives his colors bearing the club insignias and is accepted by all
5 HAMC members around the world. Becoming a member can also be referred to as being “patched.” The
6 term “full patch” refers to the complete four-piece crest, including the “Death Head” logo, two rockers
7 (top rocker: “Hells Angels”; bottom rocker: State or territory claimed), and the rectangular “MC” patch
8 below the wing of the Death Head. Full-patch members are required to pay club dues and contribute to
9 the established legal defense fund. Each individual charter specifies the amount paid for club dues.

10 108. Many of the World Rules address membership, as well as the separation between
11 hangarounds, prospects, and full-patch members. The World Rules say that no “undesirables” are
12 allowed in the club, and provides several examples: “no snitches, junkies, cops or ex-cops, etc” and that
13 “[m]embership call be limited to men who are not and have never chosen to belong.” Exhibit 2. The
14 World Rules also make clear that prospects and hangarounds are not permitted to wear any Hells Angels
15 logos or the Death Head: “[p]rospects cannot wear anything but what they are officially issued as
16 Prospects. PROSPECT and CHARTER tags on left breast with the PROSPECT tag above the
17 CHARTER tag. Bottom rocker with CITY, STATE, or COUNTRY. MC tag on top right of bottom
18 rocker.” Exhibit 3.

19 109. The World Prospect By-laws also demonstrate a prospect’s subservient position (relative
20 to full-patch members) within the club. Exhibit 16. The bylaws state that prospects and prospect clubs
21 are not allowed to be on official HA club photos, and must ride at the rear of the pack on runs. Prospects
22 are also not allowed to become drunk or stoned at parties, runs or meetings, and cannot wear any
23 clothing with the words Hells Angels or HAMC on them. Exhibit 16. Likewise, individual charters have
24 also put forth similar rules. The Fresno County bylaws state that “officers will ride in front of the
25 motorcycle pack,” with “members behind officers, prospects behind members, hangaround behind
26 prospects, friends and others behind hangaround.” Exhibit 13.

27 110. I have been able to observe the interactions between prospects and hangarounds and full
28

1 patch members at many Hells Angels events. Consistent with the rules, I have seen hangarounds
2 wearing “Support 81” shirts, but not any articles of clothing with the words “Hells Angels” or the Death
3 Head logo. Prospects are recognizable at Hells Angels events because they wear vests that contain only
4 the state bottom rocker and the word “MC.” Like hangarounds, they also do not wear any items of
5 clothing that use “Hells Angels” or the Death Head logo. I have observed hangarounds and prospects
6 running errands for Hells Angels members, providing security at events, and guarding motorcycles.

7 111. Tattoos. A majority of new members get an HAMC tattoo as soon as they attain full
8 membership. Some charters require a new member to have it within one week of earning their patch or
9 one year from the date of full patch. It is rare that a member will not have at least one HAMC tattoo on
10 his body.

11 112. I know that a majority of members get an HAMC tattoo from my observation of Hells
12 Angels at the events described above. I also know that some charters require new members to get a
13 tattoo: the Fresno County bylaws state that “[a] new member will get a club tattoo within a 30 day
14 period.” Exhibit 13.

15 113. **Left and Out:** There are only two ways to leave the HAMC, Left or Out. “Left” means
16 the member left on good standing and is required to have an out date, the date he quit the HAMC, next
17 to or near his HAMC tattoo. “Out” means the member was thrown out of the HAMC and is required to
18 cover up his HAMC tattoos. The tattoo can be covered by another tattoo, blacked out or crossed out.
19 When a member is thrown out of the HAMC, the method of covering up the tattoo is based on the
20 circumstance and/or charter. Often, the member is physically restrained and his tattoo is covered up or
21 removed altogether. This can also be accompanied by assault. It is not uncommon for a former
22 member’s residence to be ransacked after his tattoo has been covered up or blacked out—depending on
23 the charter and severity of his expulsion. A person removed in this way is considered to be in bad
24 standing with HAMC.

25 114. I have reviewed a document titled “Analysis on how to use Left and Out” which was
26 “made by a European Working Group.” Exhibit 15. The document defines “LEFT” as a person who
27 “leaves the club for different personal reasons, or his is told to leave the club or he will be thrown out.”
28

1 This person is “okay with the club” and can “talk and socialize with him, as they like.” The former
2 member “should write Left and the date in an obvious way near his tattoos, give back his Hells Angels
3 paraphernalia and respect the club and its rules after leaving.” Exhibit 15. The document defines “Out”
4 as “[t]he person is thrown out of the club and no one wants to see him again.” He “will have to cover up
5 his tattoos and stay out of sight.” “Nobody can have any kind of contact with him unless his former
6 charter gives permission, or a majority of his country wants to investigate the matter of his dismissal.”
7 Exhibit 15.

8 115. The HAMC World Rules use the words “left” and “out” consistently with the above. The
9 rules state that “[c]harter autonomy decides if a person is LEFT. . . . A LEFT person must right LEFT
10 and date his most visible tattoo, give back his Hells Angels paraphernalia and respect the Club and its
11 rules after leaving.” Exhibit 3 at EXPERT-00000232. The rules also state that “[t]he charter must
12 immediately inform the rest of the world about the OUT-persons status, which includes a photo. . . The
13 charter has to ensure that the Out-persons tattoos are covered or removed.” Exhibit 3 at EXPERT-
14 00000233. The Fresno County bylaws also reference covering up tattoos: it requires those who have left
15 the Hells Angels to “[b]lack out tattoos” and include an “out date.” Exhibit 13.

16 116. I know of instances where “Out” members were beaten out of the HAMC. For example,
17 on March 25, 2016, Aden Stay, HAMC Honolulu president, was violently beaten out of the HAMC for
18 allegedly conducting explicit social media communication with an incarcerated member’s wife. At the
19 behest of HAMC San Diego president Guy Castiglione, Stay and members of the charter were lured to
20 the HAMC San Diego clubhouse, where Stay was violently beaten by an unknown number of HAMC.
21 Stay sustained a concussion and a broken jaw after he was struck with a baseball bat. After Stay had
22 been kicked out of the HAMC, an unknown member of HAMC San Diego direct messaged him via
23 Instagram stating, “Fucking clown. Don’t act like u went out good! U faked it o make it! Best take this
24 pic down! Don’t think we forgot about you! Stunt man! Don’t know shit about loyalty! Respect our
25 Brotherhood! Just another fag writing a book!”

HAMC Territory

26
27 117. On July 1, 1961, the HAMC first expanded beyond the California border by opening an
28

HAMC charter in Auckland, New Zealand. Since 1961, the HAMC has officially opened charters on six of the seven continents.

- a. On July 30, 1969, the HAMC expanded into London, England, making it the first charter in Europe.
- b. On August 23, 1975, the HAMC expanded into Melbourne, Australia.
- c. In 1977, the HAMC continued its international expansion into Sorel, Quebec, Canada. In Canada, the expansion was met with stiff resistance by the Outlaws OMG, which had already established a foothold in Quebec. This expansion led to considerable violence, including a number of murders of Outlaws and HAMC members.
- d. On June 16, 1984, the HAMC opened a charter in Rio de Janeiro, Brazil, creating the first official footprint in South America.
- e. On August 14, 1993, it expanded into Johannesburg, South Africa, establishing the first charter in Africa.
- f. On September 30, 2006, the HAMC established its first charter in Asia – Moscow, Russia.

118. HAMC continues to increase expansion efforts, both in the United States and abroad. At present, there are over 500 charters on 6 continents. In the United States, HAMC has 99 charters and approximately 1,000 members and prospects.

119. I know about the Hells Angels expansion because it is documented on their website.

120. As described above, the Hells Angels' claim to territory has led to violence. I have attached as Exhibit 17 a set of investigative reports, charging documents, and newspaper articles describing violent incidents between the Hells Angels and the Mongols. As explained above, this violence arose from a dispute over territory:

- a. September 5, 1977 – Two Mongols were killed in San Diego County, California, returning from their national run.
- b. September 9, 1977 – A car bomb detonated at the Mongols' funeral in the mortuary's parking lot – no deaths.

- c. September 24, 1977 – A bombing occurred at the Mongols' machine shop in Los Angeles, California – two killed.
- d. September 30, 1977 – A bombing and attempted murder of a Mongols member occurred in San Fernando Valley, California.
- e. October 11, 1977 – An attempted murder of a Mongols member occurred after a bomb was discovered under his vehicle in San Diego, California.
- f. February 10, 1989 – Aristeo Carbajal, HAMC Berdoo, California, was stabbed and killed during a melee between the HAMC and Mongols in Long Beach, California.
- g. February 22, 2001 – An HAMC member and Mongols member were wounded at the American Legion Hall during a Confederation of Clubs meeting in California. In all, two were shot and four were wounded.
- h. August 1, 2001 – Four HAMC members confronted the Mongols president at his residence in Carson City, Nevada – a fight ensued.
- i. October 1, 2001 – Approximately seven to eight HAMC members entered a Mongols motorcycle shop in Nevada and accosted an individual and his assistant, both of whom are Mongols members.
- j. October 26, 2001 – HAMC, Mongols and Vagos individuals were involved in a fight at a motorcycle show in Orange County, California. There were numerous injuries.
- k. October 27, 2001 – Approximately 20 Mongols lured 5 to 6 HAMC members to a Nevada bar and assaulted them with various weapons. An HAMC bottom rocker was cut off – one arrest.
- l. April 8, 2002 – A melee occurred inside Harrah's Casino in Laughlin, Nevada, during the 20th Annual Laughlin River Run – three dead (1 Mongols and 2 HAMC individuals) and numerous injuries and arrests.
- m. June 1, 2002 – HAMC and Mongols individuals pulled knives on each other in Reno, Nevada. Reno Police Department intervened before anyone was stabbed.
- n. July 2, 2002 – Approximately four to five Mongols attacked HAMC Buryl McCune at

Bruiser's Iron Horse Saloon in Palm Springs, California. They beat him with knives, fists and feet.

- o. April 26, 2006 – Two Mongols riding their motorcycles on the Las Vegas, Nevada, strip were attacked at a red light by James "Cornbread" Beard, HAMC Las Vegas.
- p. May 4, 2008 – An unknown group of HAMC members attacked a Mongols member as he walked with his family at the Merced County, California, fair.
- q. June 28, 2008 – In Los Banos, California, an HAMC prospect was stabbed during a confrontation with the Mongols at a Victory Outreach Anti-Gang/Anti-Violence rally.
- r. August 2, 2008 – Mark "Papa" Guardado, HAMC San Francisco, was shot and killed in California by Christopher Ablett of the Mongols. Ablett is currently serving a life sentence without parole.
- s. December 20, 2008 – HAMC Sin City, Nevada, members and prospects accosted two members of the Mongols at a Las Vegas, Nevada, wedding chapel. Numerous HAMC individuals were sentenced.
- t. June 21, 2008 – Jose Luis Sanchez of the Mongols fired 8 to 10 rounds outside The Echo nightclub in Los Angeles, California, at suspected HAMC members. Three persons were injured. Sanchez was convicted in 2013 (firearm use and street gang act).
- u. November 6, 2009 – An unknown number of Mongols stabbed and killed an HAMC associate at the Pastime Club in Merced County, California.
- v. May 1, 2010 – An unknown number of HAMC and support club members assaulted a Mongols member at the Bada Bing Strip Club. One support club member was stabbed.
- w. September 29, 2010 – Jess Dyckma, HAMC Ventura, California, attempted to kill an unknown Mongols member by kicking him off his motorcycle in Los Angeles County, California. Dyckma was sentenced to 7 years.
- x. June 15, 2011 – Paul Seifert, HAMC Las Vegas, struck a Mongols Arizona prospect with a beer bottle at a bar in Las Vegas, Nevada.
- y. August 10, 2011 – A large group of HAMC individuals attacked a small contingent of

Mongols outside Pee Wee Choppers in Sturgis, South Dakota. Two HAMC suspects were convicted: George Caruso (Lowell) and Mark Duclos (Fairbanks).

z. January 7, 2012 – An HAMC hang-around attempted to run three Mongols off the road in Tempe, Arizona. One of the Mongols shot and injured the hang-around.

aa. March 22, 2014 – HAMC and Mongols were involved in a melee on Interstate 15 (I-15) in Temecula, California. Saucedo, HAMC Riverside County, was stabbed.

bb. August 20, 2014 – HAMC and Red Devils assaulted a member of the Mongols in a Raleigh, North Carolina, bar.

cc. September 12, 2014 – A shootout occurred between HAMC and Mongols at a Reno, Nevada, bar – no injuries.

dd. September 20, 2014 – One Mongols supporter was killed after an unknown number of HAMC individuals shot at their pack on southbound I-15 near Corona, California.

ee. February 7, 2015 – Patrick Eberhardt, HAMC Cave Creek, Arizona, was shot off his motorcycle by an unknown assailant in a vehicle in Phoenix, Arizona. One killed – Mongols are suspects.

ff. February 7, 2015 – HAMC shot at a pack of 15 Mongols in Phoenix, Arizona.

gg. April 19, 2015 – An HAMC Nomads, Washington, hang-around was shot and wounded outside the HAMC clubhouse. Mongols are suspected of the shooting.

hh. June 17, 2015 – Four Orange County Mongols assaulted a lone HAMC supporter at the Off Limits Bar in Anaheim, California

ii. September 4, 2015 – An unknown number of HAMC and Mongols were involved in a melee at the Boot Grill in Loveland, Colorado.

jj. September 24, 2015 – Justin Bovender, Mongols Richmond, Virginia, violently assaulted a civilian wearing an HAMC support shirt in Richmond.

kk. January 26, 2016 – Jonathan Smith, HAMC Bakersfield, California, and Mike Blackwood of the Mongols were involved in an assault at a Bakersfield intersection – Blackwood was stabbed.

- 1 ll. April 8, 2016 – An unknown number of HAMC and Mongols were involved in a melee at
2 the Valk Hotel in Rotterdam, Netherlands – 23 arrested.
- 3 mm. May 25, 2016 – Two HAMC Fayetteville, North Carolina, members and four
4 associates violently assaulted two Mongols at a Hooters in Fayetteville. Two were
5 charged, and three are pending trial.
- 6 nn. June 12, 2016 – Rick Hoernke, HAMC Berdoo, California, was shot in the leg at the
7 Wooden Nickel Bar. Prior to the shooting, a Mongols prospect was shot and accosted.
- 8 oo. August 17, 2016 – A shootout occurred between the HAMC and Mongols at the Final
9 Sports Bar & Grille in Tempe, Arizona. The Mongols president, Richard Garcia, was
10 killed. Wayne Whitt, HAMC Mesa, was cleared on self-defense grounds.
- 11 pp. August 28, 2016 – An HAMC member and prospect shot and wounded a member of the
12 Mongols and 69'ers in Nassau County, New York. HAMC dons a Filthy Few patch.
- 13 qq. September 2016 – A group of HAMC assaulted two Mongols in Spokane, Washington.
- 14 rr. November 19, 2016 – An HAMC supporter was battered by a pack of Mongols in Las
15 Vegas, Nevada. They stole his support shirt and conducted a strong-armed robbery.
- 16 ss. December 4, 2016 – HAMC Southern California prospect Aaron Vecchiarelli was shot
17 while riding his motorcycle on the eastbound 91 freeway. Simultaneously, a member of
18 the Mongols Fullerton, California, was reportedly stabbed.
- 19 tt. March 31, 2017 – Aaron Vecchiarelli, HAMC Southern California, and prospect Anthony
20 Casio conducted a drive-by shooting at the motorcycle shop of John “Dutch” Vanderpyle,
21 Mongols Harbor, in Anaheim, California.
- 22 uu. May 21, 2017 – Joshua Herbert, Mongols Commerce, California, shot and killed HAMC
23 Southern California prospect Jason Duty at a gas station. A second prospect was
24 wounded. Trial pending.
- 25 vv. August 18, 2017 – A shooting transpired between the HAMC and Mongols on Highway
26 395 near Richland, Washington. One HAMC was injured, five arrested.
- 27 ww. March 7, 2018 – A melee occurred at the Native Bar & Grille in Mesa, Arizona,
28

between the Mongols and HAMC. Numerous Mongols were arrested – trial pending.

xx. May 5, 2018 – Mongols and HAMC were involved in a shooting during an HAMC event in Bakersfield, California. One of the Mongols was killed, and an HAMC associate was cleared on self-defense – trial pending.

yy. May 12, 2018 – An HAMC Nomads, Washington, individual was assaulted by an unknown number of Idaho Mongols.

zz. May 14, 2018 – Kaleb Mohr, HAMC Nomads, Washington, and Terry Ivie, Mongols, Snake River, were involved in a shooting in Pocatello, Idaho. There were minor injuries.

aaa. July 6, 2018 – Two Utah Mongols were shot on Freeway 210 in San Bernardino, California. One was killed, and one was injured. HAMC was suspected, not confirmed.

bbb. July 22, 2018 – An HAMC supporter and a former HAMC support club (801) prospect, “Cowboy,” were assaulted in Newport Beach, California, by the Mongols.

ccc. August 25, 2018 – Steven Helland, HAMC Nomads Arizona, and prospect Michael Higuera were attacked by two Mongols at the Laughlin, Nevada, Riverside Casino.

121. HAMC and Vagos: Similar to the Mongols, the HAMC was angry that the Vagos wore a California bottom rocker. Since the mid-1980s, they have been involved in violent and deadly confrontations. Many of their clashes stemmed from the Vagos expanding into the HAMC’s territory. I have attached as Exhibit 18 a set of newspaper articles describing some of these incidents:

- a. On August 21, 2010, fearing expansion by the Vagos in Arizona, the adversaries exchanged approximately 50 rounds during a gun battle in Chino Valley, Arizona. During the shootout, Kevin Christensen, HAMC Yavapai County, was injured.
- b. On June 4, 2011, four members of the HAMC Sonoma County, California, charter assaulted a Vagos member as he was departing a tattoo convention at the Konocti Vista Casino.
- c. On September 23, 2011, a shootout transpired between the two at the John Ascuaga’s Nugget Casino during the annual Street Vibrations Fall Rally. During the melee, the

HAMC exchanged shots with the Vagos. Several HAMC San Jose, California, associates were brutally assaulted, while their president, Jeffrey Pettigrew, was shot and killed by a member of the Vagos. The next day, an unknown member of the HAMC shot and wounded a member of the Vagos in Reno, Nevada.

- d. On May 10, 2014, Paul Gibson, HAMC Oahu, Hawaii, stabbed David Coombes, formerly of Vagos, 12 times near James Kealoha Beach Park, Hawaii. During the stabbing, Gibson was a prospect. Gibson also pointed a handgun at the victim's wife.
- e. On September 14, 2016, Francisco "Cisco" Fernandez, HAMC North, shot and wounded the president of the Green Machine, a Vagos support club, after he rode past his business in Yuba, California. One month prior, Fernandez was involved in a shooting with a civilian during a road-rage incident.
- f. On September 20, 2014, HAMC members confronted a group of Vagos and Wanted OMG, which is comprised of Norteños gang members, during an apparent meeting. The gangs exchanged gunfire, and two HAMC members were wounded.
- g. On January 17, 2015, a group of HAMC members and prospects from an assortment of Northern California chapters violently assaulted two Vagos during the Easy Rider Show in Sacramento, California.

122. The HAMC has also been involved in violent confrontations with the Outlaws, Pagan's, and Banditos OMGs over territory. I have attached as Exhibit 19 a set of investigative reports and newspaper articles describing some of these incidents.

I declare the foregoing is true and correct to the best of my knowledge.

Dated: June 29, 2020

/s/ Jeremy Scheetz

Jeremy Scheetz
Intelligence Operations Specialist
Bureau of Alcohol, Firearms,
Tobacco, and Explosives

Exhibit 1

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

Law Enforcement Experience and Assignments

2003 – 2006

Critical Information Specialist, ATF Headquarters, Joint Support Operations Center

- Inserted, removed and managed ATF active and former warrants
- Assisted field operations with ongoing incidents
- Acted as a conduit between ATF headquarters and state and local law enforcement agencies from across the globe

2006 - 2014

Intelligence Research Specialist (IRS), ATF Headquarters, Office of Strategic Intelligence and Information

- Debriefed active and potential Outlaw Motorcycle Gang/s (OMG) sources of information
- Primary and secondary intelligence asset during short and long-term OMG investigations
- Instructed on numerous OMG topics at a litany of venues, conferences, agencies - domestic and abroad
- Analyzed sensitive, secret and top secret law enforcement intelligence as it pertained to domestic and foreign OMG
- Constructed and disseminated OMG reports, tactical and strategic
- Constructed link charts for use in OMG investigations and court
- Monitored OMG events, domestic and abroad
- Briefed ATF command staff on OMG trends and patterns, as well as ongoing OMG investigations

2014 - Present

Intelligence Operations Specialist (IOS), ATF Headquarters, Office of Strategic Intelligence and Information

- Debrief active and potential OMG sources of information
- Assist ATF Special Agents and Task Force Officers glean OMG intelligence from sources of information
- Serves as a primary and secondary intelligence asset during short and long-term OMG investigations
- Instruct on numerous OMG topics at a litany of venues, conferences, agencies, and enforcement agencies, both domestic and abroad
- Analyze sensitive, secret and top secret law enforcement intelligence as it pertains to domestic and foreign OMGs
- Construct and disseminate OMG reports, tactical and strategic

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

- Construct link charts for use in OMG investigations and court
- Monitor OMG events, domestic and abroad
- Assist multiple State and Federal law enforcement agencies with OMG investigations and intelligence assets across the globe

Education

1997 – B.A. in History from Marymount University, Arlington, VA, 22207

Military

1997 – 2001 – Operations Specialist, Second Class Petty Officer, USS George Washington, CVN-73, Norfolk, VA

Specialized Law Enforcement Training

2006 – Graduated Drug Enforcement Agency (DEA) Basic Intelligence Research Specialist Academy, Quantico, VA

Awards

- Received letters-of-appreciation from the South Dakota Division of Criminal Investigations, 2011, 2012, 2013, 2014, 2016, 2017 and 2019
- Received letter of appreciation from ASAC Charlotte Field Division, Hells Angels Motorcycle Club (HAMC) U.S.A. Run, Clemson, SC, 2019
- Received letter of appreciation from Sussex and Surrey Police Departments, HAMC London 50th Anniversary Party, 2019
- Received letter of appreciation from CBSA, Operation Path Finder, 2019
- Received letter of appreciation from RAC Kansas City Field Division, HAMC U.S.A. Run, 2017
- Received letter of appreciation from SAC Denver Field Division, HAMC U.S.A. Run. 2016
- Received letter of appreciation from ATF SAC New York Field Division, Operation on the Road Again, 2015
- Received letter of appreciation from Victoria Police, Task Force Echo, 2015
- Received letter of appreciation from New South Wales Police Service, Criminal Groups Squad, 2015
- Received letter of appreciation from Queensland Police Service, Taskforce Maxima, 2015
- Received letter of appreciation from ASAC San Francisco Field Division, 2014
- Received letter of appreciation from SAC Seattle, Operation Ghost Busters, 2014
- Received letter of appreciation from The United States Attorney's Office, District of South Carolina, Columbia, South Carolina, Operation Angel Bane, 2013

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

- Received letter of appreciation from Sheriff Las Vegas Metropolitan Police Department, Operation Pure Luck, 2013
- Received letter of appreciation from ATF Washington Field Division ASAC, Operation Black Diamonds, 2012
- Received letter of appreciation from ATF SAC Los Angeles Field Division, Operation Black Rain, 2009
- IOMGIA, Robert Faulkner Award for Operation on the Road Again, 2012
- IOMGIA, Robert Faulkner Award for Operation Black Diamonds, 2011
- IOMGIA, Wade Garner Memorial Award, 2011
- IALEIA, Analytical Award, 2009

Specialized Experience Analyzing and Monitoring OMGs

January 2006 - Present

I have been involved with numerous long-term State and Federal OMG investigations. During an investigation, I am responsible for, but not limited to, creating charts, timelines, de-briefings, overt surveillance, rosters and courtroom preparation/expert analysis. More importantly, on a day-to-day basis, I am responsible for making sure each individual in the investigation is up to speed with pertinent, but precise, intelligence. I am often a conduit on separate investigations, which may share common factors are kept apprised on parallel cases.

Along with investigative and intelligence support, I have traveled the globe working and/or monitoring OMG events, parties and runs. Since 2008, I have worked the annual HAMC U.S.A. Run, collecting intelligence and information from confidential informants, arrest reports and photographs taken during the event. Since 2006, I have worked Myrtle Beach Bike Week; Virginia Beach Bike Week; and numerous events sponsored by, but not limited to, the HAMC, Pagan's, Mongols, Sons of Silence, Warlocks, Gypsy Jokers, Outlaws, Bandidos, Iron Horsemen, Wheels of Soul and their respective support clubs. At the request of EUROPOL, I worked several HAMC runs and/or events in Prague, Czech Republic, as well as Brighton, England.

January 2008 - Present

At the request of the South Dakota Division of Criminal Investigation, I attend the annual Sturgis Motorcycle Rally in Sturgis, South Dakota. I am assigned to the OMG (1%) Task Force, which monitors and tracks all OMGs and their supports clubs, during the rally. I am responsible for identifying all OMG members, prospects and hangarounds, as well as operating cameras in the 24-hour command post. While assigned to the command post, I am a conduit between the OMG Task Force and high-ranking State and local law

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

enforcement entities during traffic stops, arrests and violent encounters. On multiple occasions, I have provided up-to-the minute intelligence during violent clashes between the HAMC and their adversaries, non-conforming motorcycle clubs and civilians.

January 2008 - Present

During the annual HAMC U.S.A. Run, I am the lead intelligence asset to the primary state and local law enforcement agencies monitoring the run. In the months leading up to the run, I provide valuable intelligence on run location, as well as arrests and violence endured during previous HAMC events. While assigned to the command post, I am a conduit between the intelligence and enforcement assets with Federal, State and local law enforcement agencies. On multiple occasions, I have provided up-to-the minute intelligence during violent clashes between the HAMC and their adversaries, non-conforming motorcycle clubs and civilians. I am also responsible for conducting training for all intelligence and enforcement assets working the 5-day run.

January 2006 - Present

On behalf of ATF, FBI and several State and local law enforcement agencies, I have participated in numerous OMG arrest operations. During the operations, I have analyzed thousands of pieces of intelligence as it pertains to the investigation, particular OMG membership, hierarchy, structure, day-to-day operations, church minutes, officer's minutes and/or the OMG. Many of the investigations pertain to, but not limited to, narcotics and weapons trafficking, assaults, extortion, vehicular assault, insurance fraud, homicide, attempted murder, VICAR and RICO.

January 2008 - Present

I have presented to numerous Federal, State, and local law enforcement agencies on OMG topics, to include an overview of OMGs in the United States; how OMG expansion leads to violence; OMG patches, tags and rockers; OMGs and the Southwest border; OMG migration; OMGs and the military; predictive analytics; street gang transition to OMG; the Hells Angels Corporation; and being an analyst during a long-term OMG infiltration or investigation. I have also traveled the globe educating law enforcement departments, as well as United States Federal agencies, on significant trends and patterns in the OMG community, to include OMGs and the military, OMGs among law enforcement and government agencies, and firefighters/emergency medical technicians (EMTs) within OMGs. During the presentations, I deliver a complete and thorough global OMG overview, to include recent, pertinent and relative trends and patterns. I routinely discuss up-to-date violence and its significance to the traditional dominant White and African-American/multiracial OMG communities. More importantly, I signify the correlation between active duty, reservist and National Guard soldiers, plus

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

State and Federal government employees and contractors, to specific OMGs.

I have also briefed high-ranking elected officials from the United States, England, Denmark, Norway, Netherlands, Germany, Thailand, Vietnam, Japan, Canada, Australia and EUROPOL on OMGs and the aforementioned topics.

January 2006- Present

I have been responsible for writing or providing expert analysis on ATF OMG Intelligence reports, such as: *OMGs and the Military*; *Annual Trends and Patterns, As It Pertains to OMGs*; *Migration of Street Gangs to OMGs*; *OMGs and the Southwest Border*; *OMGs within Fire & Rescue*; *Hells Angels Corporation*; *Hells Angels Overview for Europol*; *Bandidos Overview for Europol*; *Hells Angels Overview for the United States Attorney's Office*; and numerous OMG after-action reports and assessments pertaining to *Migration Leads to Violence*.

January 2006- Present

On a daily basis, I communicate with law enforcement assets from across the globe, concerning OMGs, OMG expansion, OMG violence and ongoing investigations pertaining to OMGs. I have also had the distinct opportunity to maintain constant communication with law enforcement assets who worked in an undercover capacity as members and/or personally conducted investigations on the following OMGs, to include debriefings of OMG members, prospects, associates and spouses: Hells Angels, Vagos, Outlaws, Mongols, Sons of Silence, Bandidos, Hell's Lovers, Iron Horsemen, Pagan's, Sin City Deciples, Wheels of Soul, Thunderguards, Malos Hechos, Chosen Few, and numerous support and friend clubs

I have also interviewed and/or actively worked ongoing investigations involving numerous sources of information who were members, former members, prospects or close associates of the aforementioned OMGs or support clubs. The sources of information provided intelligence regarding the structure and organization's hierarchy, day-to-day operations of the criminal enterprise, culture/protocols, crimes committed by members and both internal and adversarial acts of ongoing violence. I also validated intelligence that has been obtained by other investigative sources and resources.

National and International Conferences on OMGs

In my capacity as an IOS, I have also attended a number of national and international conferences, symposiums and expert seminars on the subject of OMGs as an attendee. Topics include, trends and patterns, specific information or intelligence regarding OMGs,

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

involvement in criminal activity, the meaning of old and new patches/tags and tattoos, updates on gang membership and, in the case of international conferences, overviews of OMG from investigators and intelligence assets from different countries. On multiple occasions, I have debriefed former members of an OMG on topics, such as gang structure, gang activity, internal and external business, adversaries, violence, mental capacity, etc. These conferences provide an opportunity to discuss OMGs with other investigators, analysts and law enforcement assets from across the globe

May 2014 - Present

Since 2014, I have been a member of the International Outlaw Motorcycle Gang Investigators Association (IOMGIA) and currently hold the position of co-training coordinator on the board of directors. IOMGIA is a nonprofit organization started in 1974 to provide professional training and information sharing concerning outlaw motorcycle gangs (OMGs) in the United States and abroad. Its membership consists of Federal, State and local law enforcement entities from across the globe involved in investigating, analyzing, monitoring and prosecuting OMGs and their motorcycle club affiliates. An IOMGIA stated goal is “to improve the investigative skills and educational organization.” As both a member and serving on the board of IOMGIA, I have established an extensive network of colleagues involved in investigating, tracking, monitoring and prosecuting OMGs throughout the world. On a weekly basis, I correspond with law enforcement entities in North America, Australia, Asia, Europe and South America, referencing a plethora of OMG topics, such as violence, expansion, ongoing investigations and prosecution. During the annual conference, I often conduct a 30-minute United States overview concerning trends and patterns, OMG migration leads to violence and OMGs in the military.

Ongoing and Past Presentations Regarding OMGs

I have lectured at numerous gang conferences, expert symposiums in Canada and EUROPOL, for distinguished guests at ATF HQ, State and government agencies, foreign embassies and a litany of gang conferences across the globe. I have delivered lectures in front of approximately 750 sworn and non-sworn law enforcement personnel, as well as distinguished and/or elected members of a foreign country looking for a United States overview or an in-depth and analytical overview of a particular OMG or motorcycle club. Below is a listing of all the scheduled lectures, presentations and classes I have instructed:

2008

- ATF HQ, Washington, D.C., ATF OMG Investigations, June 2008

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

2009

- International Association of Law Enforcement Intelligence Analysts (IALEIA) Conference, Las Vegas, NV, OMG and Military, April 2009
- ATF Special Operations Division (SOD), Atlantic City, NJ, Pagan's Overview, April 2009
- IOMGIA, Nashua, NH, OMG and Military, September 2009

2010

- Department of Defense (DOD) OIG, ATF HQ, OMG and Military, January 2010
- NGIC, Arlington, VA, OMG Overview, January 2010
- ATF HQ, Washington, D.C., Pagan's Overview, February 2010
- Massachusetts State Police, Westfield, MA, OMG and Military, June 2010
- MAGLOCLN Conference, Baltimore, MD, OMG and Military, July 2010
- U.S. Attorney's Office, Washington, D.C., HAMC Overview, August 2010
- ATF HQ, Washington, D.C., Pagan's Overview and Investigative Support, August 2010

2011

- Illinois National Guard, Chicago, IL, OMG and Military, January 2011
- Defense Manpower Data Center (DMDC) Command Staff, Monterey, CA, OMG and Military, March 2011
- Special Forces and Delta Force Command Staffs, Fayetteville, NC, OMG and Military, March 2011
- Air Force Policy, Pentagon/Arlington, VA, OMG and Military, April 2011
- U.S. Navy SEAL Teams, Dam Neck/Virginia Beach, VA, OMG and Military and HAMC Overview/South Run, April 2011
- ATF HQ, Washington, D.C., OMG Overview, April 2011
- DEA SOD, Leesburg, VA, HAMC Overview, June 2011
- ATF Newark, Patterson, NJ, OMG Trends and Patterns, Pagan's Overview, August 2011
- IOMGIA, Nashua, NH, OMG and Military, September 2011
- U.S. Army, Ft, Eustis, VA, OMG and Military, October 2011

2012

- United States Customs and Border Protection (CBP) HQ Command Staff, CBP HQ/Washington, D.C., OMG and U.S. Border, February 2012
- Canadian Outlaw Motorcycle Gang Investigators Conference (COMGIC), Ottawa, Ontario, Canada, U.S. OMG Trends and Patterns, March 2012

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

- DOJ, Washington, D.C., OMG Trends and Patterns and HAMC Overview, March 2012
- Virginia Gang Investigators Association (VGIA), Fredericksburg, VA, OMG Overview and OMG and Military, May 2012
- Northwest Gang Investigators Association (NWGIA), Seattle, WA, OMG Trends and Patterns, May 2012
- DEA SOD, Chantilly, VA, HAMC Overview, July 2012
- IOMGIA, St. Louis, MO, Intelligence for an OMG Investigation, September 2012
- New York Chiefs of Police Conference, Albany, NY, OMG Overview, October 2012
- Peach Bottom Nuclear Plant, Annapolis, MD, OMG and Military, October 2012
- VGIA, Virginia Beach, VA, OMG Trends and Patterns, October 2012
- Project Safe Neighborhood (PSN) Conference, Milwaukee, WI, October 2012
- Senior Enlisted Meeting, Norfolk, VA, OMG and Military, December 2012

2013

- VGIA, Fairfax, VA, OMG Migration Leads to Violence, February 2013
- Naval Criminal Investigative Service (NCIS) and U.S. Army Criminal Investigation Command (CID), Quantico, VA, OMG Migration Leads to Violence and Trends and Patterns, March 2013
- IOMGIA, St. Paul, MN, OMG Migration Leads to Violence, June 2013
- CBP Command Staff, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, July 2013
- U.S. Army CID Command Staff, Quantico, OMG and Military, July 2013
- ATF HQ, Washington, D.C., Norwegian Parliamentary member, OMG Migration Leads to Violence and Trends and Patterns, July 2013
- IOMGIA, St. Paul, MN, United States OMG Overview, September 2013
- Department of Homeland Security (DHS) Fusion Center, Arlington, VA, Intelligence for and OMG Investigation, September 2013
- Combined Law Enforcement Intelligence Group (CLEG), Ocean City, MD, OMG Migration Leads to Violence and Trends and Patterns, October 2013
- VGIA, Virginia Beach, VA, OMG Migration Leads to Violence and Trends and Patterns, October 2013
- ATF Dallas, ATF Special Operations Undercover Branch and U.S. Army Special Operations, Intelligence for an OMG Investigation, December 2013

2014

- CBP Command Staff, Washington, D.C., OMG and Southwest Border, February 2014

CURRICULUM VITAE

Jeremy Scheetz

Intelligence Operations Specialist

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

ATF Headquarters, 99 New York Ave, NE,

Washington, D.C. 20226

- U.S. National Guard, Arlington, VA, OMG and Military, February 2014
- VGIA, Fairfax, VA, OMG Migration Leads to Violence and Trends and Patterns, March 2014
- Biker Enforcement Unit, Ontario, Canada, HAMC Experts Meeting, HAMC Corporation, March 2014
- Virginia State Police Gang Conference, Roanoke, VA, OMG Migration Leads to Violence and Trends and Patterns, March 2014
- Biker Investigations Association of Northern California (BIANCA), Lake Tahoe, NV, OMG Migration Leads to Violence and Trends and Patterns, June 2014
- Wildwood Pre-Run, Wildwood, NJ, OMG Migration Leads to Violence and Trends and Patterns, August 2014
- Danish Dignitaries, FBI Washington, D.C., United States OMG Overview, August 2014
- Milwaukee Gang Conference, Milwaukee, WI, OMG Migration Leads to Violence and Trends and Patterns, September 2014
- IOMGIA, Denver, CO, OMGs and Southwest Border, September 2014
- OMG Experts Meeting, Europol/The Hague, Netherlands, United States OMG Overview, October 2014
- VGIA, Virginia Beach, VA, OMG Migration Leads to Violence and Trends and Patterns, October 2014
- DOD, Arlington, VA, OMG and Military, November 2014
- Department of Energy (DOE), Washington, D.C., OMG and Transportation/Long-Haul Drivers, November 2014
- ATF Command Staff, ATF HQ, Washington, D.C., OMGs and Southwest Border, November 2014
- Danish Dignitaries, ATF HQ, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, December 2014

2015

- South Carolina Gang Investigators Association (SCGIA), Myrtle Beach, SC, OMG Migration Leads to Violence and Trends and Patterns, February 2015
- U.S. National Guard, Arlington, VA, OMG and Military, February 2015
- Victoria Police Department/Australian Dignitaries, Melbourne, Australia, OMG Migration Leads to Violence and Trends and Patterns, March 2015
- New South Wales Police Force, Sydney, Australia, OMG Migration Leads to Violence and Trends and Patterns, March 2015
- Queensland Police Service, Brisbane, Australia, OMG Migration Leads to Violence and Trends and Patterns, March 2015
- Fairfax County Police Academy, Fairfax, VA, OMG Migration Leads to Violence

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

- and Trends and Patterns, April 2015
- Virginia State Police, Roanoke, VA, OMG Migration Leads to Violence and Trends and Patterns, April 2015
- Outlaw Motorcycle Criminal Gangs (OMCG) Experts Meeting, Bangkok, Thailand, Foundations of Starting an HAMC Charter, May 2015
- East Coast Gang Investigators Association (ECGIA), State College, PA, OMG Migration Leads to Violence and Trends and Patterns, May 2015
- NCIS Command Staff, ATF HQ Washington, D.C., OMG and Military, June 2015
- Belgium Attaché', ATF HQ Washington, D.C., July 2015
- ATF IRS Training Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, July 2015
- NCGIA, Pinehurst, NC, OMG Migration Leads to Violence and Trends and Patterns, September 2015
- High Intensity Drug Trafficking Area (HIDTA), Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, October 2015
- OMG Experts Meeting, EUROPOL/The Hague, United States OMG Overview, November 2015
- Netherlands Embassy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, December 2015

2016

- ATF Director, OMG Migration Leads to Violence and Trends and Patterns, March 2016
- ATF Wheeling, Morgantown, WV, OMG Migration Leads to Violence and Trends and Patterns, April 2016
- HIDTA/Department of Transportation (DOT), San Antonio, TX, OMG Traffic Stops and Trends and Patterns, April 2016
- ATF Intelligence Research Specialist (IRS) Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, and OMG Intelligence for an Investigation, April 2016
- U.S. National Guard, Arlington, VA, OMG and Military, April 2016
- IOMGIA, Kansas City, MO, OMG Migration Leads to Violence and Trends and Patterns, May 2016
- Netherlands Law Enforcement Interns, ATF HQ, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, May 2016
- COMGIC, Montreal, Quebec, Canada, OMG Migration Leads to Violence and Trends and Patterns, June 2016
- California Gang Investigators Association (CGIA), Anaheim, CA, OMG

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

- Migration Leads to Violence and Trends and Patterns, August 2016
- ATF IRS Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, August 2016
- Texas Governors Association, San Antonio, TX, OMG Migration Leads to Violence and Trends and Patterns, August 2016
- IOMGIA, Kansas City, MO, OMGs and First Responders, September 2016
- Vietnam OMCG Experts Meeting, Hanoi, Vietnam (SKYPE), OMG Expansion into Asia, September 2016
- Missouri Gang Investors Association (MGIA), Springfield, MO, OMG Migration Leads to Violence and Trends and Patterns, September 2016
- VGIA, Virginia Beach, VA, Former HAMC Source and Spouse, October 2016
- OMG Experts Meeting, EUROPOL/The Hague, United States OMG Overview, November 2016

2017

- Pentagon Security Forces, Arlington, VA, Phantoms OMG and Firemen, January 2017
- ATF IRS Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, February 2017
- ECGIA, Providence, RI, Mindset of a Former Outlaws President, April 2017
- ECGIA, State College, PA, OMG Migration Leads to Violence and Trends and Patterns, May 2017
- Midwest Gang Investigators Association, Madison Dells, WI, OMG Migration Leads to Violence and Trends and Patterns, May 2017
- Oklahoma Gang Investigators Association (OKGIA), Tulsa, OK, OMG Migration Leads to Violence and Trends and Patterns, June 2017
- HAMC U.S.A. Run, Lake of the Ozarks, MO, OMG Migration Leads to Violence and Trends and Patterns and HAMC Identification, June 2017
- ATF IRS Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, July 2017
- IOMGIA, Scottsdale, AZ, OMG Patch/Tag Identification and Definition, September 2017
- ECGIA, Rehoboth Beach, DE, OMG Migration Leads to Violence and Trends and Patterns, September 2017
- Mississippi Gang Investigators Association (MSGIA), Biloxi, MS, OMG Migration Leads to Violence and Trends and Patterns, November 2017
- Dutch Dignitaries, ATF HQ, Washington, DC, OMG Migration Leads to Violence and Trends and Patterns and HAMC Colors Ban, December 2017

CURRICULUM VITAE

Jeremy Scheetz

***Intelligence Operations Specialist
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
ATF Headquarters, 99 New York Ave, NE,
Washington, D.C. 20226***

2018

- Mid-Atlantic Regional Gang Investigators Association (MARGIN), Ocean City, MD, OMG Migration Leads to Violence and Trends and Patterns, February 2018
- Calgary Police Service, Calgary, Alberta, Canada, OMG Migration Leads to Violence and Trends and Patterns, May 2018
- Transnational Organized Crime (TOC)-DHS, Cheyenne, WI, OMG Firearms Trafficking Patterns Across the Globe, June 2018
- German Dignitaries, ATF HQ, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, June 2018
- CGIA, Anaheim, CA, OMG Migration Leads to Violence and Trends and Patterns, August 2018
- Wisconsin Fusion Center, Milwaukee, WI, OMG Migration Leads to Violence and Trends and Patterns, August 2018
- ATF IRS Academy, Washington, D.C., OMG Migration Leads to Violence and Trends and Patterns, August 2018
- Wildwood Pre-Run, Wildwood, NJ, OMG Migration Leads to Violence and Trends and Patterns, August 2018
- IOMGIA, Myrtle Beach, SC, U.S. Overview and Street Gang to OMG, September 2018
- BAGIA, Foster City, CA, OMG Migration Leads to Violence and Trends and Patterns, September 2018
- OCDETF Fusion Center, Merrifield, VA, OMG Migration Leads to Violence and Trends and Patterns, October 2018

2019

- OCDETF Fusion Center, Merrifield, VA, OMG 101, January 2019
- MARGIN, Anne Arundel, MD, OMG Migration Leads to Violence and Trends and Patterns, March 2019
- NCIS, Quantico, VA, OMG Migration Leads to Violence and Trends and Patterns, April 2019
- OCDETF Fusion Center, Merrifield, VA, OMG Trends and Patterns and Global Perspective, April 2019
- ECGIA, State College, PA, OMG Migration Leads to Violence and Trends and Patterns, May 2019
- ATF New York Field Division, Bronx, NY, OMG Migration Leads to Violence and Trends and Patterns, May 2019
- NGIC, FBI Indianapolis, IN, OMG Migration Leads to Violence and Trends and Patterns, July 2019
- ATF Firearms Trafficking Group, Vienna, VA, OMG Migration Leads to

CURRICULUM VITAE

Jeremy Scheetz

Intelligence Operations Specialist

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

ATF Headquarters, 99 New York Ave, NE,

Washington, D.C. 20226

- Violence, Trends and Patterns and Firearms and Narcotics Trafficking Patterns within the OMG Underworld, July 2019
- HAMC U.S.A. Run, Clemson, SC, OMG Migration Leads to Violence, Trends and Patterns and HAMC Identification, July 2019
 - NCGIA, Winston-Salem, NC, OMG Migration Leads to Violence, Trends and Patterns and NC Overview, August 2019
 - NCIS, Quantico, VA, OMG Migration Leads to Violence, Trends and Patterns and OMG and Military, August 2019
 - ATF Nashville, OMG Migration Leads to Violence, Trends and Patterns, Predictive Analytics and OMG and Military, September 2019
 - IOMGIA, U.S. Overview and Trends and Patterns, September 2019

Exhibit 2

THE DEFINITIVE HISTORY: EVOLUTION OF THE HELLS ANGELS MOTORCYCLE CLUB INSIGNIA AND CORPORATION

In March 2017, just before the Sixtieth Anniversary of the Oakland Hells Angels Charter, several of the longest serving Hells Angels Motorcycle Club members reviewed Club and Corporation records, worked with our lawyer to prepare sworn declarations, and set down for posterity the truth and nothing but the truth about the evolution of the iconic insignia of the Hells Angels. Members that gave testimony were: Ralph “Sonny” Barger, Gordon Gary “Flash” Grow, Robert Poulin, and John “Fuki” Fukushima. Here is that history:

The first Hells Angels motorcycle club, “Hells Angels Berdoo” was founded in March 1948 in the Fontana/San Bernardino, California area. One of its founding members was William Charles “Bill-Rocky” Graves (“Rocky Graves”) who was a World War II veteran. However, it is a myth that our Club founders were part of the 303rd Hell’s Angels Bomber B-17 Group from World War II. Extensive research has confirmed that there was no lineage between the 303rd Hell’s Angels Bomber B-17 Group and the Hells Angels Motorcycle Club other than that they shared the same name. The term “Hell’s Angels” had been bouncing around the military as far back as World War I, when a fighter squadron first took on the name. Before World War II, a group of mercenary war pilots called the “Flying Tigers” flew for the Chinese, and one of their squadrons called themselves “Hell’s Angels.” During World War II, a few groups called themselves Hell’s Angels, including an American Air Force bomber company stationed in England, the 358th Bomber Squadron, and a Navy torpedo squadron.

Initially, Hells Angels clubs in California were only loosely affiliated, but stayed in communication with and respected one another. During the 1950’s, the Hells Angels clubs then in existence in California, such as Hells Angels Berdoo, Hells Angels Frisco, Hells Angels So Cal., and Hells Angels Oakland, joined into one motorcycle brotherhood: The Hells Angels Motorcycle Club. The Hells Angels Motorcycle Club (the “Club”) has used the HELLS ANGELS name in commerce continuously since 1948.

After the Hells Angels Motorcycle Club was formed, then-existing individual clubs became charters of the Club. Officers of the Club’s Charters, such as Hells Angels Frisco, Hells Angels Oakland, Hells Angels Berdoo, and Hells Angels So Cal, began meeting together as a Board of

Directors for the Club. Decisions made by that Board were binding on the California Charters, and all Charters had to approve the admission of any new Charter. The Board of Directors established Restrictive guidelines about how the various Charters' membership cards and membership insignia, such as the Death Heads and Patches could be used and displayed. Membership patches, worn on the back of jackets, vest and the like only by Club members, with top rockers, bottom rockers, and a Charter's "Death Head" and small "MC" in between the rockers, were commonly referred to as the "colors". Death Head designs are described in more detail below, and were always and only used to signify membership in a Charter and the Club.

Over time, more Hells Angels charters were admitted in California. The first Charter outside California was in Omaha, Nebraska; the second was in Lowell, Massachusetts. Barger.

The Club began to develop internationally in 1961, when the first charter in Auckland, New Zealand was admitted. During the 1960's, the Club also spread to other states of the United States. In 1969, the first European Club charter was admitted, in London, England. Today there are more than 250 official Club charters in Europe. At the end of the 1970's, Australian Club charters were admitted, and, in 1984, Rio de Janeiro, Brazil became the first South American Club charter. In 1993, Club charters were admitted in the African continent. A charter in Turkey became the first Muslim country to join the Club in 2009. Today the Club has spread its wings all over the globe.

EVOLUTION OF THE HELLS ANGELS INSIGNIA

The Original Death Head of Hells Angels Berdoo

In 1948, Hells Angels Berdoo members used a small design with a skull, helmet, and two wings for its membership insignia. That logo became known later by Club members as the "Original Death Head". A true and correct copy of the Original Death Head is below; it is distinguished by its double wings, a rounded eye, and an open mouth:



The Original Death Head

The Original Patch of Hells Angels Berdoo

In 1948, Hells Angels Berdoo members also began using a membership insignia that consisted of “HELLS ANGELS” in the “upper rocker”, the Original Death Head in the center, and “BERDOO” in the “bottom rocker” (the “Original Patch”). Minor variations in the Original Patch occurred because they were hand sewn. A photo from Life Magazine showing Hells Angels Berdoo members wearing the Original Patch is as follows:



The Original Patch

The Modified Original Death Head of Hells Angels Frisco (Heart-Shaped Eye)

In 1953 or 1954, Rocky Graves organized a San Francisco, California, Hells Angels charter known as “Hells Angels Frisco”. In 1955, the Hells Angels Frisco reorganized with thirteen charter members, including Frank Sadilek, who served as President. Around that time, Hells Angels Frisco members created a modified version of the Original Death Head (the “Modified Original Death Head”). Like the Original Death Head, it too was relatively smaller in size when it was used in the membership patch, compared to the size of the Fuki Death Head as used in the current Membership Patch. A true and correct copy of the Modified Original Death Head is below. It too had double wings, and is distinguished from the Original Death Head by the heart-shaped eye:



Modified Original Death Head

The Smaller Death Heads

Both the Original Death Head and the Modified Original Death Head were later referred to as the “Smaller Death Head”. Both of the Smaller Death Heads had two wings.

The Original Frontview Death Head

Another derivative of the Original Death Head is known as the “Original Frontview Death Head”. A true and correct copy of the Original Frontview Death Head is below.



The Frontview Death Head

The Original Frontview Death Head was created by Lurch Burkett, a member of the Hells Angels Oakland Charter for “USA Motorcycle Run #1” t-shirts. The Original Frontview Death Head was created for and on behalf of Hells Angels Oakland, and at its instance and expense, under its supervision and subject to its approval, and Hells Angels Oakland owned all rights, title, and interest in and to the Original Frontview Death Head upon its creation, and used in commerce only between and among members as an indicia of membership in the Club of motorcycle enthusiasts, and not supplied whether by sale or otherwise to the public. The Hells Angels Motorcycle Corporation (“World Corp”) has registered its trademark rights in the Original Frontview Death Head in Canada and Australia. The Original Death Head Mark as registered in Australia is modified slightly. A true and correct copy of the Original Death Head Mark as registered in Australia is below:



Australia Front View Death Head

The Membership Card

In 1954, Hells Angels Frisco hired an artist to create a membership card (hereafter, the “Membership Card”). A true and correct copy of a blank Membership Card is shown below:



The Membership Card

During 1953 and 1954, members of Hells Angels Frisco frequently hung out and had meetings at Rialto pool hall on the northeast corner of 7th and Market Street, San Francisco, California during the years 1953 and 1954 and later. They got to know a tattoo artist who also hung out in that same pool hall who went by the name “Sundown”. Sundown was a tattoo artist whose shop was in the same building as the pool hall located at 7th and Market Streets in San Francisco. Sundown’s real name was Bob Kistner.¹ One living person who was a member of Hells Angels Frisco at that time remembered Sundown, and helped us establish his real name.

Hells Angels Frisco members had ideas about what the membership card should look like and they had examples of the Patches Club Charters then in California were using. One patch had a skull wearing an aviation helmet with wings. They knew how they wanted the membership card to look, but they were not artists and could not draw it. The members knew Sundown, from the tattoo shop in the same building as the pool hall where they met, could draw.

On September 9, 1954, Hells Angels Frisco decided to hire Sundown to help them put their ideas about a membership card into a graphic form that could be printed for each Charter

¹ Listings in Polk’s San Francisco City Directory, published in 1953, identified the pool hall as Rialto Billiards with the address of 1138a Market Street, San Francisco, CA. Rialto Billiards was where Hells Angels Frisco members met Sundown. Contained within Polk’s San Francisco City Directory 1953 is the listing for “Kistner, Robt D. Tattooing” with an address of 1138 Market Street, San Francisco, California.

member. The minutes of the Hells Angels Frisco Charter's meeting held on September 9, 1954, state, in pertinent part:

"It was decided that Sundown was to receive \$2.50 for artwork on our club cards – and that he would be allowed three clean, unvoided cards for display purposes in his business."

Sundown provided only technical illustration services that would allow the membership card to be reproduced for and on behalf of Hells Angels Frisco, and at its direction, insistence, and expense. He worked under Hells Angels Frisco's close supervision. Hells Angels Frisco members reviewed the rough sketches that Sundown created, made comments and Sundown changed the drawing to their specifications. Hells Angels Frisco approved the final design. Hells Angels Frisco owned and its successor, the World Corp, owns all rights, title, and interest in and to the Membership Card. Sundown did not retain any rights, title or interest in the Membership Card except the very limited right to display the Membership card in his business as an example of his skills.

After the Membership Card was created other Charters' members began using it as well. The body of each Membership Card was as above, except for a small section that ran the length of the left-hand border, where the Member's "Charter" affiliation was identified. True and correct copies of "activated" Membership Cards are below.





The Hells Angels So. Cal. Patch

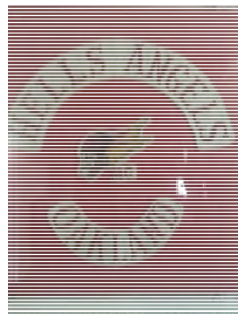
In the late 1950's, with permission, the Hells Angels So. Cal. Charter used a Death Head design with only one wing, like the Death Head on the Membership Card, with colors added. True and correct depictions of the Hells Angels So. Cal. Patch are as follows:



Hells Angels So. Cal. Patch

Oakland Hells Angels Original Patch

Originally, Oakland Hells Angels used a membership insignia Patch that included the Hells Angels Frisco Original Death Head in the middle. A true and correct copy of that Hells Angels Oakland Patch follows:



Original Oakland Charter Patch

The Barger Larger Patch (8 and 8 Feather Points)

In 1959, Ralph “Sonny” Barger was President of the Oakland Hells Angels. With permission and approval of Hells Angels Frisco and Hells Angels So Cal, he used the Sideview Death Head from the Membership Card to create a new Death Head for Hells Angels Oakland to wear as a “Patch” on jackets or vests as an indicia of membership in the Oakland Hells Angels. Another Oakland Hells Angels member, John “Johnny A” Palomar, and Barger used an opaque projector to project the Membership Card on the wall to the size they wanted it for a Patch and traced the Death Head. Barger added colors like those used by Hells Angels So Cal and worked with a company that did embroidering to get satisfactory thread colors and created the final Hells Angels Oakland Death Head. This version of the Death Head became known as the “Barger Larger”. The Barger Larger Death Head is distinguished by its being larger than the Original Death Head relative to the top and bottom rockers in the Patch configuration, it has a single wing, and it has two sets of eight (8) feather tips along the bottom border. A true and correct copy of the Barger Larger Death Head design is as follows:



The Barger Larger Death Head

The Betty Patch

At and around this time, all Patches were hand-sewn and there were some variations based on who did the sewing. A Death Head based on the Barger Larger was sewn by a woman named Betty, and it became known as the Betty Patch. A true and correct copy of the Betty Patch Death Head is as follows:



The Betty Patch

The Fuki Death Head (9 and 8 Feather Points)

In 1983, as part of standardizing the brand, the “Fuki Death Head” was created in a digital form that would help eliminate the natural variations in patches that resulted from them being hand-made. The member who created that version of the Death Head using computer tools to create a digital version assigned all rights, title, and interest in and to it to World Corp. The Fuki Death Head is distinguished from the Barger Larger because it has seventeen (17) feather points along the bottom border, in one set of nine (9) and one set of eight (8). The Barger Larger Death Head has sixteen (16) feather points along the bottom border, in two sets of feathers with eight (8) feather points each. A true and correct copy of the Fuki Death Head is below, as is a true and correct copy of the Fuki Death Head as embroidered in Patch form. Use of gray thread in the feathers is a permitted variation.



The Fuki Death Head



The Fuki Death Head Patch

The USA Patch Layout

In 1983, as part of standardizing the brand in the United States, the standard Patch Layout Pattern was created. A true and correct copy of the Patch Layout Pattern, containing the Fuki Death Head, is as follows:



The USA Patch Layout

The World Club Patch

In a world meeting in August 1990, Club members decided that every Club member would wear the same Club patch based on the Patch Layout Pattern and that the Fuki Death Head would be the standard Death Head for use in the Club Patch (the “Patch”). A true and correct copy of the Patch is shown below:



The World Club Patch

The Patch was created for and on behalf of Hells Angels of the United States, Inc., at its expense, and under its supervision and approval, and Hells Angels of the United States, Inc. owned and its successor World Corp owns all rights, title, and interest in and to the Patch. Only licensed vendors are permitted to create the embroidered Patches.

At all times since the creation of the Patch, Hells Angels of the United States, Inc. and then World Corp and its predecessors have imposed extremely restrictive guidelines that prohibit any and all copying or use of the Patch by anyone for any purpose other than to signify membership in the Club. Every Club charter and member has been and is bound to these very restrictive rules. Distribution and display of copies of the Patch, and licensed rights to create copies of the Patch and to wear it, have been permitted only to Club Members and then for use only as an indicia of membership in the Club.

A more recent image of a Club member wearing the Patch correctly is as follows:



EVOLUTION OF THE WORLD CORPORATION

On June 26, 1966, the Club started to get ready to incorporate the Hells Angels.

On August 6, 1966, Club members voted to create a nonprofit corporation referred to informally in discussion as “Hells Angels MC California.” Also on that day, I was elected chairman of the Board of the still unincorporated association.

The primary purpose of the nonprofit corporation would be to own, license, and protect the intellectual property of the Club, such as the Membership Card, the Death Heads described above, Patches, the “Colors”, and all derivations of them (hereafter, the “HAMC IP”).

It took several years of discussion to decide exactly how the corporation would be formed. During that time, the Board of the Club oversaw and enforced the very restricted use of the HAMC IP.

On November 30, 1968, one of the Board members, Robert (Bob) Roberts, took responsibility for having our Large and Small Death Heads “patented.” It took quite some time before that actually happened.

Up through 1969, U.S. Club members utilized the Original Death Head, the Modified Death Head, the Hells Angels So Cal. Patch, and the Larger Barger in Patches and otherwise as their membership insignias. Only the Board of Directors of the unincorporated Club could grant new Charters the right to use any of the Hells Angels Insignia. For example, on August 23, 1969, director Bob Roberts gave his signed approval for England’s use of a small Death Head, and as President, I gave my signed approval for its use of the Barger Larger Death Head.

On June 28, 1969 the Club decided that no inactive members can wear membership insignias such as the Death Heads and Patches.

On June 20, 1970 the Club voted at a meeting to prevent non-members from using the trademark “Hells Angels” and it was noted that if non-members refuse to stop using “Hells Angels” after being notified they could be sued.

On September 2, 1970 Hells Angels Frisco incorporated as a *nonprofit* corporation called “HELLS ANGELS OF SAN FRANCISCO, INC.”

The Club decided to have a *nonprofit* corporation own all Hells Angels Insignia worldwide so that no private individual or company would own Hells Angels Insignia and so that Hells Angels Insignia would be used and managed for the benefit of Club Charters and members and not for private profit or gain.

At or around that time, Club members from all the Charters began to refer to Hells Angels of San Francisco, Inc. as the “Corporation” and all members and Charters agreed that the Corporation would manage, oversee, and enforce all the Hells Angels Insignia, including all the small and large Death Heads, the Patches, and the Membership Cards. The Corporation did in fact thereafter manage, oversee, and enforce the rights in and to all the Hells Angels Insignia internationally, including being the only one that could grant new Charters the right to use any of the Hells Angels Insignia.

In 1971 or 1972, a lawyer in Los Angeles set up The Hell’s Angels Motorcycle Club, Inc. as a *for profit* corporation and registered this Death Head as trademark for that corporation:



Setting up that *for profit* corporation and registering the Death Head as a trademark owned by it was a mistake that we, as directors acting for and on behalf of the Club, straightened out. That for profit corporation was dissolved. The trademark registration was assigned to Hells Angels, Frisco, Inc. in 1975 via a recorded Assignment, a true and correct copy of which recorded Assignment is attached hereto as Exhibit RSB2. That registration is now dead.

On May 4, 1973, Hells Angels of San Francisco, Inc. changed its name to HELLS ANGELS, FRISCO, INC.

On October 3, 1981 the Club voted to change the name of Hells Angels, Frisco, Inc. to HELLS ANGELS OF THE UNITED STATES, INC., with me as chairman of its Board, and decided that the Corporation would use the Hells Angels Oakland clubhouse’s address. The Corporation continued to be a *nonprofit* corporation.

In and around October 1981, Club Charters and Club members who had participated in creating any of the Hells Angels Insignia agreed that the nonprofit corporation (then named HELLS ANGELS OF THE UNITED STATES, INC.) would own all copyrights, trademarks and other intellectual property and all intellectual property rights of the Charters, including but not limited to the Original Death Head, the Original Patch, the Modified Original Death Head, the Hells Angels So Cal Patch, the Membership Card, the Barger Larger Death Head and the Betty Patch. By oral agreement, which was fully and legally binding on all the Charters and members at that time, all the Hells Angels Insignia was assigned into the Corporation, then Hells Angels of the United States, Inc.

On July 25, 1983, HELLS ANGELS OF THE UNITED STATES, INC. changed its name to HELLS ANGELS MOTORCYCLE CLUB, INC.

On November 13, 1984, HELLS ANGELS MOTORCYCLE CLUB, INC. changed its name to HELLS ANGELS MOTORCYCLE CORPORATION, amended its purposes, and changed its status from a “public benefit” nonprofit corporation to a “mutual benefit” nonprofit corporation. HELLS ANGELS MOTORCYCLE CORPORATION is the current name of the Corporation, and which is referred to throughout this Declaration as the “World Corp”.

On April 10, 2003, the World Corp formed a separate domestic *nonprofit* corporation in Nevada with the name of HELLS ANGELS MOTORCYCLE CORPORATION, Nevada Corporation No C8536-2003. The California nonprofit corporation continued to exist, but was left dormant for a time.

In 2003 and 2004, the World Corp assigned some trademarks owned by HA-IP Corp-World to HAMC-NV.

On December 31, 2008, all rights, title and interest in and to the trademarks that were assigned to HAMC-NV were assigned *back* to the World Corp, as were other HAMC-related trademarks that HAMC-NV had registered or applied to register while in existence.

On March 26, 2009, HAMC-NV was dissolved and all operations were thereafter and all time since have been conducted by the World Corp, a California mutual benefit nonprofit corporation.

The direct successor-in-interest of Hells Angels Frisco is the World Corp. The World Corp is active and in good standing as a California mutual benefit nonprofit corporation. Importantly, there are no private shareholders or owners and no private equity in the corporation. Rather, it is managed by a Board of Directors, elected by the World membership for the mutual benefit of the World members and Charters.

The World Corp's specific purpose is to "exercise legitimate control over the use of, and licensing for, the various trade, service and collective membership marks utilized by various independent motorcycle chapters organized under the laws of various states and/or foreign countries." Amended and Restated Articles of Incorporation, Section 2.2

The World Corp owns all Hells Angels Insignia and Hells Angels intellectual property.

OWNERSHIP OF THE HELLS ANGELS INSIGNIA AND RESTRICTIONS ON USE:

The Original Death Head, the Original Patch, and related intellectual property ("HAMC IP" or "Hells Angels Insignia") were created by members of the Charters, or in the case of the Membership Card, by an artist hired by the Charter, for and on behalf of their Charter, at their Charter's instance and expense, under their Charter's supervision and subject to their Charter's approval. They did not create the Death Heads, Patches, or other HAMC IP for their own personal accounts or private profit, but rather for the benefit of their brothers, their Charters, and the Club. The Hells Angels Death Heads, Patches, and Membership Cards were and always have been used - to this day -- in commerce only between and among members as an insignia of membership in the Club of motorcycle enthusiasts, and not supplied whether by sale or otherwise to the public. Barger. Upon creation of each Hells Angels Insignia, and before the corporation that is now named the Hells Angels Motorcycle Corporation was formed, the Charter, not the individual member or artist, owned all rights, title, and interest in and to the Hells Angels Insignia.

As part of creating an identity for the Hells Angels Motorcycle Club, the officers of the early California Charters, serving as a Board of Directors for the Club, established restrictive guidelines that bound all the Charters and their members about whom could wear and display Hells Angels Insignia. The only exception to these restrictive guidelines was the "81" symbol, which the Hells Angels allows non-members to use as an indicia of support for the Hells Angels.

Although its name has changed over the years, the World Corp unequivocally and without challenge exercises an unbroken chain of title and control of all the Hells Angels Insignia and the HELLS ANGELS name, for the benefit of and in constructive trust for the Hells Angels Motorcycle Club Charters and members around the world. The World Corp has registered its trademark rights and copyrights in the Hells Angels Insignia in the United States, Australia, the European Union, and many other countries around the world.

At all times since the creation of any of the Hells Angels Insignia, the original Charters, the Hells Angels Motorcycle Club, and the World Corp and its predecessors-in-interest have imposed extremely restrictive guidelines that prohibit any and all copying or use of the Hells Angels Insignia by anyone for any purpose other than to signify membership in the Club. Every Club charter and member has been and is bound to these very restrictive rules. Distribution and display of the Hells Angels Insignia, and licensed rights to create copies of the Hells Angels Insignia, have been permitted only to Club Charters and members, and then for use only as an indicia of membership. Neither the Club nor the Corporation has ever permitted the Hells Angels Insignia to be published or used for any other purpose, except extremely limited promotion of membership activities. There exist clear guidelines even for the symbol “81” which does not signify membership in the Hells Angels, and so is permitted to be used by non-members to signify support for the Hells Angels,

Since then, the World Corp and its predecessors have exclusively owned all Hells Angels Insignia, including any derivatives created nationally and internationally, and have exercised or licensed all rights, title, and interests in and to the Hells Angels Insignia for and on behalf of the Club membership, except during a brief period where the rights in some trademarks were assigned into a Nevada nonprofit corporation, which was dissolved, and ownership of those trademarks was later assigned back to World Corp. In countries where any Hells Angels Insignia is registered in the name of an individual member or Charter, it is held in constructive trust for and on behalf of the World Corp.

The World Corp holds and manages all Hells Angels Insignia in accord with very restrictive historically binding guidelines and decisions made by the World membership of the Club. Its board of directors are elected by the World membership.

The World Corp owns and licenses the Hells Angels Insignia for the mutual benefit of and use by the Club members, Charters, and the Club internationally, and not for private profit or private benefit. It and the Club prohibit the use of the Hells Angels Insignia for or in connection with any criminal activity or enterprise.








With the exception of the trademark “81”, which designates support and supporters of the Club, World Corp has always had (and still does have) extremely restrictive guidelines that prohibit any and all copying, or use, or display of Hells Angels Insignia by anyone for any purpose other than to signify membership in the Club. Every Club charter and member has been and is bound to these very restrictive rules. Distribution of copies of the Hells Angels Insignia (except for ‘81”), and licensed rights to create copies of Hells Angels Insignia (except for ‘81”) have been permitted only to Club Members and then for use only as an indicia of membership in the Club. In very limited circumstances, World Corp or its predecessors have permitted altered Patches to be used in films or books about the Hells Angels or Hells Angels members.

World Corp permits Charters around the world to create recognizable and official derivatives of the Death Head for their geographic areas, but all such derivative versions are subject to the same restrictive use and display guidelines as apply to the Fuki Death Head, the Barger Larger, the Original Death Head, the Modified Original Death Head, and the Front Facing Death Head, and all such derivative Death Heads are owned by World Corp or held by licensed Charters or Members in constructive trust for and on behalf of World Corp.

The World Corp’s Amended and Restated Articles of Incorporation provide that: “No part of the net earnings of the corporation shall inure to the benefit of any member or private shareholder, as defined for the purposes of Section 501(c)(7) of the Internal Revenue Code of 1954.” Amended and Restated Articles of Incorporation, Section 2.5

REPRESENTATIVE REGISTRATIONS OF HELLS ANGELS INSIGNIA

The World Corp owns or controls all copyrights, trademarks, and intellectual property (“HAMC IP”) arising from or related to the Hells Angels Motorcycle Club internationally. Most iconic among the HAMC IP are the following:

Mark/Creative Work	Name	Registration/Application No(s).
		<u>U.S.</u> : 1943341 and 4525359 <u>International Registration</u> : 971196 <u>Brazil</u> : 812870468 <u>Canada</u> : TMA354187 <u>EU</u> : 454819 <u>Italy</u> : 864501 <u>Norway</u> : 201316 <u>UK</u> : UK00002279712, UK00001398846
	Sideview Death Head	<u>U.S.</u> : 2588116 <u>Australia</u> : 723463 <u>UK</u> : UK00002279711
	Sideview Death Head	<u>EU</u> : 283044 <u>International Registration</u> : 971198 <u>Norway</u> : 201264 <u>UK</u> : UK00001121251, UK00001396717
	The Patch	<u>U.S.</u> : 5062349
	Frontview Death Head	<u>U.S.</u> : 3666917 <u>EU</u> : 297929 <u>International Registration</u> : 971199 <u>Norway</u> : 201265 <u>UK</u> : UK00001178037
	Original Death Head	<u>U.S.</u> : 3040750
	Membership Card	U.S. Copyright Registration No. Vau001214935
	Fuki Death Head	U.S. Copyright Application filed September 18, 2015

This “Definitive History: Evolution of The Hells Angels Motorcycle Club Insignia and Hells Angels Motorcycle Corporation” was authored by Brooke Oliver, Attorney for the Hells Angels Motorcycle Corporation, March 30, 2017, based on sworn Declarations.

Exhibit 3

HELLS
ANGELS
MOTORCYCLE
CLUB
WORLD RULES
2017



**“These rules are to make our Club life easier.
If they don’t work,
the rules are wrong, or the people are wrong.”**

Hells Angels Member 1978

Table of Contents

Page 3	Foreword
Page 5	Table of Contents
Page 7	The Book
Page 9	Preface & Objectives
Page 11	Constitutional Rules
Page 13	Riding Rules
Page 15	Prohibitive Rules
Page 18	Standard Rules
Page 21	Organizational Rules
Page 24	Admission Rules
Page 26	Voting Rules
Page 28	Internet Rules
Page 30	Corporation Rules
Page 32	Prospect Rules
Page 35	Traditions
Page 36	Our Patch
Page 37	Through the decades
Page 38	Appendix A
Page 39	Appendix B
Page 40	Appendix C
Page 41	Appendix D

The Book:

- The Hells Angels Motorcycle Club World Rule Book makes all other past World Rules and sets of World Rules obsolete.
- The book of World Rules and the rules within the book must not be reprinted, copied or digitally reproduced in part or in full.
- The Hells Angels Motorcycle Club is and has always been an English speaking Club, therefore the Rule Book must not be translated into any other language.
- The World Rules must always be followed, but any country, state or charter can make their own stricter rules.
- Each charter will be issued one Rule Book with its number on it. After a period of time all charters will be issued updated editions of the Rule Book. The old Rule Books must then be destroyed by the Custodian.
- Every five years all Rule Books will be updated, reprinted and redistributed.
- Any frozen or closed charter's Rule Book is to be returned to the Custodian immediately.
- In addition to the Rule Book there will be a Reference Book with motions, tallies, dates, explanations etc. This Reference Book will be accessible to all charters, meetings and other forums if requested.
- New motions will be categorized before the Membership vote on them and then if past provided in a suitable format to all National Secretaries to pass on to all charters.
- If a Rule Book is lost, the charter must immediately contact its National Secretary who will contact the Custodians. If the charter cannot get it back, then they can contact the Custodians and request a new Rule Book.

Preface & Objectives

PREFACE

Hells Angels Motorcycle Club World must follow the World Rules listed in this book and also abide the Hells Angels Motorcycle Corporation rules and directions, as these protect our name, logo and trademark. In addition the Members of the Club are answerable to their own countries current laws and rules.

It is the responsibility of every Hells Angels Member to acquaint themselves with this set of rules.

OBJECTIVES

Hells Angels MC World is a Motorcycle Club, where the Members are a Brotherhood with a common interest in motorcycles and motorcycling.

The Hells Angels Motorcycle Club is non political and does not condone any unlawful or illegal activity.

Constitutional Rules

1. All Members and Prospects must ride a motorcycle no less than 750 cubic centimeters.
2. One man – One vote.
3. Only Hells Angels will possess Hells Angels paraphernalia. (No ex-Member or Prospect is allowed to keep any type of Club property or indicia.)
4. Members can have only one set of patches at a time. (Racing patch exception)
5. Members must wear the same computer design style patch.
6. To form a charter there must be a minimum of six Members on the street.
7. Disputes that become physical shall be fair and reflect our belief in Brotherhood (no weapons shall be used by either man). Alleged use of a weapon must be presented at an appropriate meeting and is subject to remedial measures that may include expulsion from the Club.
8. Behavior unbecoming of a Hells Angel shall be cause for immediate expulsion from the Club. *Examples include; lying, stealing or misuse of a Member's or Prospect's property, or woman.*
9. No undesirables in the Club!
For example: No snitches, junkies, cops or ex-cops, etc. Membership shall be limited to men who are not and have never chosen to belong to, or worked with any law enforcement agency or authority which has the power of arrest or incarceration.
10. No individual Member or Prospect shall belong to any other motorcycle club.
11. If any Member is found to be using a needle to inject narcotics into his body or causes narcotics to be injected into his body, the moment that this fact is known that Member is immediately out of the Club, regardless of the fact that he is dead or alive (except for medical or non-recreational purposes).
12. No use of heroin.
13. Charter autonomy is a basic right but cannot supersede any World Rule.



Riding Rules

1. All Members and Prospects must ride a motorcycle no less than 750 cubic centimeters.
2. All countries have charter autonomy concerning riding rules and motorcycling.

Prohibitive Rules

1. No more items with lightning bolts or swastikas to be manufactured, worn, sold or displayed. This covers bike paint jobs, tattoos, T-shirts or clothing of any type, jewelry, posters, flyers, Member's signatures, plaques & pictures. The ONLY exceptions allowed are EXISTING headstones, plaques, flags and tattoos.
2. If any Member is found to be using a needle to inject narcotics into his body or causes narcotics to be injected into his body, the moment that this fact is known that Member is immediately out of the Club, regardless of the fact that he is dead or alive (except for medical or non-recreational purposes).
3. Disputes that become physical shall be fair and reflect our belief in Brotherhood (no weapons shall be used by either man). Alleged use of a weapon must be presented at an appropriate meeting and is subject to remedial measures that may include expulsion from the club.
4. No HAMC charter, HAMC Member, or HAMC Prospect be allowed to market anything bearing the name Hells Angels and/or our Death Head logo without proper licensing by the corporation. **Penalty: US \$200 fine for violation to be paid to the Corporation.**
5. Do not put official World Run photos on internet sites. Do not put party photos or pictures of Brothers on internet sites without those Brothers permission.
Penalty: To be decided by a World Meeting.
6. No more support T-shirts with HELLS or ANGELS on it to be sold to the public.
7. ALL support gear (shirts, hats, rings, key chains, anything) MUST say "support" with the number 81 and must NOT have indicia that closely resembles our own (i.e. rockers, Death Heads and layout). **Penalty: US \$500 fine paid to regional treasury.**
8. No use of heroin.
9. To amend the no heroin rule to include the freebasing of addictive chemical compounds such as cocaine, meth, crack and similar chemical compounds.
Penalty: Existing penalty remains the same OUT.
10. Immediately cease manufacture, sells, wearing of, and display of or items, not limited to T-shirts, stickers, patches, banners, tattoos, stencils, graffiti etc. displaying any derogatory acronyms, symbols, logos or depictions towards any other organizations on our person, patches, motorcycles, clubhouses etc. **Penalty: US \$500 per instance and Member(s) or charter(s) to be held accountable for such action.**

11. Members must stop wearing patches, that endangers the Club and which has nothing to do with our Club. All flashes old and new to be cleared on country level. **Penalty: US \$500 fine to the charter and to be brought to the World Meeting if necessary.**
12. Only side rockers from countries which already have HAMC charters can be worn. **Penalty: US \$500 to charter and to be brought up on a World Meeting if necessary. Exceptions: To be brought up on a World Meeting.**
13. Hells Angels Member merchandise can be sold only at Member only functions or at clubhouses or whatever private functions are held for the Club. **Penalty: Booth or store to be shut down immediately.**
14. No charter or Member can use a Death Head on any public party flyer, memorial card, run program or poster that is given away to the public or displayed in a manner that it can be obtained by the public. **Penalty: 1.000 US\$ paid to the regional Defence Fund. Exceptions: This does not apply to anything given to members.**
15. Stickers that read, for example, "Support your local Hells Angels" should only be given to people that we feel close with and trust (Prospects, Hangarounds, family members, serious supporters and close friends). **Penalty: To be dealt with at a charter level, and if that is not enough, to be brought up on a national level.**
16. If you use backing underneath your patch, it must be the same color as the vest. **Penalty: You have 90 days to conform to the rule or the members charter will be fined 500 US\$ to be paid to the regional treasurer.**
17. The book of World Rules and the rules within the book must not be reprinted, copied or digitally reproduced in part, in full or translated into any other languages. **Penalty: To be decided at the Regional or World Meeting if necessary.**
18. No use of another country's or charter's Death Heads, side rockers, front flashes etc. without their permission. **Penalty: US \$100 fine to the offended charter.**
19. No charter should sell any anniversary dated items like pins, belt buckles, etc. to members who are not entitled to possess anniversary jewelry. **Penalty: US \$500 to be paid to the National Treasury.**

Standard Rules

1. All countries and Members will adhere to our tradition of 10 year Members and older having the privilege and retaining the right exclusively to wear belt buckles portraying both the name HELLS ANGELS and the DEATH HEAD.
2. All National Secretaries must have an e-mail address. **Penalty: US \$500**
3. All charters to respect all Hells Angels support items to help keep our support worldwide.
4. Members can have only one set of patches at a time (Racing patch exception).
5. Members must wear the same computer design style patch.
6. To require at least two (2) Members minimum, from each HAMC charter and HAMC Prospect charter to be fluent in the English language.
Penalty: US \$200 to be paid to the country hosting the event or meeting at which the attending charter/member is unable to understandably converse in English.
7. Only Hells Angels will wear Hells Angels paraphernalia. No ex-Member or ex-Prospect will possess any Club property/indicia I.E. (all patches, plaques, apparel, jewelry, paint jobs) including indicia on all personal websites.
Penalty: Club property to be returned, charter responsible to pay a fine of US \$500 with explanation at the "appropriate forum". Amendments: Options – to give a certificate of service. Name of Member, date in and out, in appreciation from charter.
8. There will be nothing on the back of the patch except the colors, which is HELLS ANGELS, DEATH HEAD, MC, and COUNTRY/STATE/CHARTER.
9. If a Member leaves the Club and he comes back, his time starts over again.
10. For all charters/city and officer tags or flashes to be rectangular in shape with square corners. **Penalty: US \$500 per tag to be paid to the Corporation. Fines to be paid to the account where your annual Corporation fees are paid.**
11. All Members must show that they are Members when seen from the front. Example: HA-pins, HA front flashes or other front flashes that shows that one is a Member.
Penalty: Member to be dealt with by charter or country.
12. If a Member is OUT, the charter he used to belong to must send a recent picture of him to all World charters. **Penalty: To be decided on a World Meeting. Member(s) or charter(s) to be held accountable for such action.**

13. If a Brother is Left or put Out because of bad or inaccurate information and it is discovered within 12 months from the date he Left or was put Out, he can be reinstated by his charter. If the 12 months period is passed the ex-Brother must prospect again according to our rules concerning the 12 months mandatory prospecting time. All reinstatements must be cleared at national level. Also all the circumstances of any reinstatement must be presented to a World Meeting. **Penalties: HAMC World would not recognize any such reinstated members. In effect they would not be entitled to wear the name Hells Angels. Those responsible for reinstating such members would be dealt with at the discretion of a World Meeting.**
14. Old patches are destroyed by burning. **Penalty: US \$1,000 to the USA Corporation.**
15. If you wear a charter tag, your own charter pin and/or an officer tag, it must be on the left breast of the patch vest. **Penalty: US \$100 to the national fund.**
16. Belt buckles with the words HELLS ANGELS and an Enamel DEATH HEAD are to be worn only by Members with at least 20 years in the Club.
Penalty: US \$500 to the National Treasury.
17. Only Members can ride a motorcycle with Hells Angels insignia, except in extenuating circumstances. **Penalty: US \$100 fine paid to the offended charter.**
18. If a Member leaves a charter, or if his charter folds, he has thirty days to transfer to another charter or he is Out of the Club.
Penalty: Out of the Club. Exceptions: If he is in hospital or jail.
19. Members should live in the county, state, or country their charter is located in unless agreed upon by both charters involved. **Penalty: To be dealt with on a regional level.**
20. A transfer must be approved by both charters involved. A transfer letter stating the Member is in good standing and signed by the President of the charter he left, should go with him to the charter he is transferring to. **Penalty: Transfer is not recognized.**
21. Charter autonomy decides if a person is LEFT. The charter can amend or adjust any other status, if needed and the membership must respect their decision. The charter sends out information when a person has LEFT. A LEFT person must write LEFT and date his most visible tattoo, give back his Hells Angels paraphernalia and respect the Club and its rules after leaving.

22. Charter autonomy decides if a person is OUT. The charter can amend or adjust any other status, if needed and the Membership must respect their decision. The charter must immediately inform the rest of the world about the OUT-persons status, which includes a photo. The charter has to ensure that the OUT-person no longer has access to any Hells Angels e-mail accounts. The charter has to ensure that the Out-persons tattoos are covered or removed. The charter must retrieve all Hells Angels paraphernalia. Only his former charter can have contact with an OUT-person or give others permission to contact him. This was accepted and agreed to by all members when joining the club.
23. You must be in a Charter for one year before you transfer to a different Charter, regardless of how many Charters you have transferred to or from.
Penalty: at the discretion of a World Meeting

Organizational Rules

1. There will be at least one (1) Member from every HAMC charter & Prospect charter at all World Runs. **Penalty: US \$1.000 donation to be paid to the host country. Extenuating circumstances will be considered.**
2. Each country to have at least 2 representatives at all World Meetings. **Penalty: Fine for missing World Meeting will be US \$2.000 funds to be paid to the host country by the next World Meeting. Exceptions must be appealed with an acceptable reason by the next World Meeting.**
3. Not to have two consecutive World Meetings in countries not accessible by all country reps.
4. If there are immigration problems and only a few country reps are represented at World Meetings, each country should be notified of issues to be voted on and have a 90 day response.
5. To simplify World Meetings, country representatives are to give the agreed media to the Meeting Secretary containing that representative's World business and motions only. All other update information they may have such as addresses and phone numbers is to be passed out on disk to the other National Secretaries. Common programs such as Microsoft Word & Excel are to be used for this.
6. To set a dollar amount of US \$20 per Member & Prospect worldwide, for the World Run Fee. **Penalty: The amount paid by a charter is doubled if not paid 90 days prior to the World Run.**
7. When paying expenses for World Runs, monies being sent are to be collected from each charter by the country they are in and then sent to the hosting country all together with a list identifying each charters payment.
8. The costs to organize one of the World Meetings each year should be covered by all World Members and Prospects. This is the World Meeting not held at the World Run. The cost per Member and Prospect is US \$3 per year. This money should be collected and distributed by the European Corporation Representative. If any money is left over from the cost of organizing this World Meeting, it must be paid back to the European Corporation bank account as soon as possible. Any monies spent in excess of US \$3 per man per meeting must be covered by the host charter. **Penalty: If the money is not paid by the first of April every year the amount doubles.**

10. To have all left over money and fines (after bills) from World Runs to roll over to the next World Run (Not kept for that countries Defence Fund)
Penalty: To be discussed at the World Meeting.
11. To make and establish geographical supervising regions within the HA World as follows: North and Central America, South America, Africa, Europe, Oceania, and others (if necessary).
12. That the Webmaster provides all the National Secretaries in the world with an email address for each country the same way that all countries in Europe already have.
13. The World Run will be held in the USA every five years without contention. It can be held earlier than five years but no later. **Penalty: Any request for the World Run when it is USA turn will be rejected as we cannot outvote the rest of the World.**
14. That we have World Runs held in countries that are accessible to most Members.
15. Request motions that break existing world rules cannot be submitted.
16. All world motions including references to any financial matters must be written in US \$. For example; penalties, run costs, etc.
17. Any frozen or closed charter's book is to be returned to the custodian immediately.
18. If any money is to be paid to the Club either by rule or by motion is not paid in time, the amount owed will be doubled.
Penalty: If still not being paid, the case must be brought to the Supervising Region or the next World Meeting. Exceptions: To be brought to the next World Meeting.

Admission Rules

1. If a Member leaves the Club he must come back through his original charter and after one year period minimum, unless his original charter or last charter (in case he was Member in more than one charter) gives permission to go to another charter.
Penalty: US \$1,000 to be paid to the country that will host the next World Run or WM. The ex-Member must be OUT.
2. All new Clubs must do a minimum 12 months Prospect period before being voted on for full Membership as a charter. **Penalty: HAMC World would not recognize any such charter. In effect they would not be entitled to wear the name Hells Angels. Those responsible for voting in such charter would be dealt with at the discretion of a World Meeting. Exceptions: if exceptional circumstances came up all details would have to be put in front of and explained to a World Meeting, a World Motion presented and a world vote taken.**
3. Before being voted on for full Membership everyone must do a minimum of 12 months Prospect period. **Penalty: HAMC World would not recognize any such new Members. In effect they would not be entitled to wear the name Hells Angels. Those responsible for voting in such charters or Members would be dealt with at the discretion of a World Meeting.**
4. The 12 month Prospect rule allows a charter to bury a Prospect as a HELLS ANGEL as they see fit.
5. If a man of foreign nationality, from a country who already have a Hells Angels charter, seeks admission into the Club, the charter/country asked, must contact this man's original homeland before accepting him as a Hangaround.
Penalty: If there is a problem between countries on this issue, the World Meeting can decide that the particular Hangaround must stop as a Hangaround until his case is completed.
6. If six (6) members wish to start a charter in a country that does not have an existing Hells Angels charter they must get approval from Hells Angels World (they must present a World Motion and get a 2/3rds majority World Vote to start).
Penalty: If the charter is started without world approval it will not be recognized by Hells Angels MC World. Any further penalty will be decided by the World Meeting.

Voting Rules

1. One man – One vote.
2. That to change or remove a Constitutional Rule within our Club would require a 90 % majority World Vote.
3. New charters in new countries require a World Vote to be passed by a 2/3rds majority.
4. There shall be two types of motions:
 - a). motion to pass a rule. (see appendix A)
 - b). motion for request or approval. (see appendix B)

There shall be three forums where a motion can be presented; Regional, National and World. In the United States, there shall be the West Coast or East Coast, the Country and the World. In Europe, there shall be the Country, Europe and the World. In Canada, there shall be the West Coast, Central or East Coast, the Country and the World. (Areas that are not mentioned here need to be defined). When an issue is brought up it must be by a charter or the Corporation. It must be presented on the appropriate form. It must be presented in the appropriate forum. It must be explained to the representatives at the World Meeting. The motion must be accompanied by all contracts and any other pertinent paperwork necessary to further explain and fully understand the issue, if it is a legal or business matter.

Penalty: Any motion or suggested changes to a motion not following the outlined procedure will be rejected. **Amendments:** World Motions will continue to have a 90 day voting time. Charters can lobby as to why this motion should be defeated by notifying all Hells Angels charters, in writing, no later than four weeks after the motion is made.

The World Meeting (HAMC World) can present motions if 2/3rds of representatives at that World Meeting agrees that something needs to be done.

5. All motions to create, alter or remove a World Rule must encompass three World Meetings. The motion is tabled at the first WM, debated at the second and voted on at the third.
6. All World votes must be 2/3rds majority of votes cast to carry.
7. Applicant countries to host World Runs will be listed in ONE motion so each Member can vote YES for only ONE candidate. The candidate who gets the most votes will host the World Run.

Internet Rules

1. All HAMC Internet web sites must conform to adopted guidelines (see appendix C) and be approved by HAMC World Vote.
2. Charters are allowed to put our Death Heads on our web sites. But ONLY the Universal Death Head worn on our backs.
3. That all charters are to have an operative E-mail account.
Penalty: US \$200 payable to their respective countries.
4. The information allowed on web sites is to be restricted to non-sensitive and which does not endanger the safety of HAMC Members.
Penalty: To be decided by a World Meeting.
5. Do not put official World Run photos on Internet sites. Do not put party photos or pictures of Brothers on Internet sites without those Brothers permission.
Penalty: To be decided by a World Meeting.
6. That every Member, Prospect and Hangaround in the World pays US \$3 per year to help with the yearly expenses of the World Web Master.
Penalty: If the money is not paid by the first of April every year the amount doubles.
7. The attached article (see appendix D) Hells Angels Motorcycle Club Lineage Clarification is approved for release to select HAMC websites.
Amendments: no release, modification or otherwise alteration of this article, to include web linkage to other websites without the expressed permission of the author, in written form.
8. No Member is allowed to use the images that show our name or designs on any of the "public" sites as named above, as well as others that may appear in the future (My Space, Facebook, YouTube and similar sites).

Corporation Rules

1. To pay US \$20 per member worldwide to cover the cost of the trademark bill. The US \$20 would be due March 1 every year. If more monies are needed, a special request would be made.
Penalty: Not paying by March 1. would be 100% penalty of the original amount.
2. Adopt a Hells Angels property agreement.
3. No HAMC charter, HAMC Member, or HAMC Prospect be allowed to market anything bearing the name Hells Angels and/or our Death Head logo without proper licensing by the Corporation.
Penalty: US \$200 per item, per incident, to be paid to the respective Trademark Corporation of the offending charter, Member or Prospect.
4. Australia has the authority to give instructions to Australian trademark attorneys and any issues deemed necessary to ensure that the Australian registered trademarks are maintained. All issues and expenses incurred by HAMC Australia related to the Australian trademark will be the sole responsibility of HAMC Australia.
5. Any Hells Angel charter that wants to make and sell calendars to the public be allowed to do so as per the following rules. 50% of the profit goes to the Hells Angels Corporation and 50% goes to the charter or individual who is granted the merchandise licensing agreement. Before the calendar is allowed to be made, a merchandise license agreement has to be obtained from the Hells Angels Corporation. All charters will submit to the Hells Angels Corporation a complete quarterly financial statement report.
Penalty: failure to obey the above rules will deny the approval of a merchandise licensing agreement which will result in the denial of the making and sell of the calendar.
6. The Corporation can submit motions limited only to Corporation business.
7. It takes a majority (3 out of 4) of the Corporation officers to be in agreement and that the fourth have knowledge of the intent to submit a motion by the Corporation to the World.
Penalty: Fines US \$500 per instance and Member(s) or charter(s) to be held accountable for such action.

Prospect Rules

1. New Prospect countries representatives must be available at World Meetings.
Penalty: Fine for missing the WM will be US \$2.000. Funds to be paid to the host country by the next World Meeting, if only one country representative is present. Extenuating circumstances will be considered.
2. There must be at least (1) one Member from every Prospect charter at ALL World Runs. **Penalty:** US \$1.000 donation to be paid to the host country. Extenuating circumstances will be considered.
3. Prospect clubs must have a stable postal address (post box or clubhouse). Any change must be notified immediately.
4. Prospect clubs must have an E-mail address.
5. Prospects must not use the words Hells Angels or Death Heads on Christmas or Anniversary cards.
6. Prospects cannot give gifts with the words Hells Angels or Death Heads on without a HAMC charter's permission.
7. Before being voted on for full membership everyone must do a minimum of 12 months Prospect period.
Penalty: HAMC World would not recognize any such new Members. In effect they would not be entitled to wear the name Hells Angels. Those responsible for voting in such charters or Members would be dealt with at the discretion of a World Meeting. Exceptions: If exceptional circumstances came up all details would have to be put in front of and explained to a World Meeting, a World motion presented and a World vote taken.
8. All new clubs must do a minimum 12 months Prospect period before being voted on for full membership as a charter.
Penalty: HAMC World would not recognize any such charter. In effect they would not be entitled to wear the name Hells Angels. Those responsible for voting in such charter would be dealt with at the discretion of a World Meeting. Exceptions: If exceptional circumstances came up all details would have to be put in front of and explained to a World Meeting, a World motion presented and a World Vote taken.

9. Prospects cannot wear anything but what they are officially being issued as Prospects. PROSPECT and CHARTER tags on left breast with the PROSPECT tag above the CHARTER tag. Bottom rocker with CITY, STATE or COUNTRY. MC tag on top right of bottom rocker.
Penalty: US \$1.000 fine to be payable by the Charter from whom the Prospect belongs. If it's a Prospect Charter, the sponsoring Charter is responsible for the fine. All fines payable to the Corporation.
Exceptions: Prospecting Charters or Prospect Countries are able to wear officer tags, if the Sponsor Charter allows.
10. Hangaround Clubs in new countries must send a minimum of one rep per club to the World Run and both (2) World Meeting locations every year. Any excuse should they miss one of these events must be presented to a World Meeting by their sponsor country.
Penalty: US \$2.000. **Exception:** If any Hangaround Club is not able to attend because of immigration problems, or a reasonable excuse is provided, the penalty will not be enforced.
11. Prospects can't transfer. **Penalties:** The Prospect status has to change to - Left the Club And: The charter that allowed the Prospect's transfer to pay US \$1.000 fine to the national defense fund. And: The charter that accepted the Prospect's transfer to pay US \$1.000 fine to the national defense fund. **Exceptions:** The charter the Prospect belongs to get closed or frozen. The charter the Prospect belongs to splits up into new charters.

Traditions

TRADITIONS ARE BELIEFS OR CUSTOMS PASSED ON FROM ONE GENERATION TO THE NEXT, OFTEN VERBALLY, THAT IS UNDOCUMENTED BUT ARE UNDERSTOOD TO BE RESPECTED AND FOLLOWED.

1. Suicide is unacceptable and is considered conduct unbecoming of a Hells Angel.
2. All side view Death Head pins and patches should face the same way as our back patch, except in the case of opposing pins or patches.
3. If a Member loses any club item(s) there should be a US \$100 penalty per item, collected at the charters discretion.
4. If we bury a Member we bury our own, whenever possible.
5. Patches and rockers should be in English alphabet only.

Our Patch



TO BE USED AS A GUIDE ONLY.
ACTUAL MEASUREMENTS MAY VARY DUE
TO MANUFACTURING TOLERANCES.

Through the decades



Appendix A

(THIS SIDE FOR SECRETARIES USE ONLY)

Motion Made By:

Motion Type:

Date:

Descriptive Name:

Presented To:

Motion Number:

1/ Problem or Reason:

2/ Solution:

3/ Motion:

4/ Penalty:

5/ Exceptions:

6/ Amendments:

Votes Yes/For:

Votes No/Against:

Appendix B

(THIS SIDE FOR SECRETARIES USE ONLY)

Motion Made By:

Motion Type:

Date:

Descriptive Name:

Presented To:

Motion Number:

1/ Reason For Request:

2/ Motion Or Request:

3/ Amendments:

Votes Yes/For:

Votes No/Against

Appendix C

HAMC WORLD GUIDELINES FOR HAMC WEB SITES

The following guidelines are established for any HAMC web site, basis for these guidelines are to insure that information, regardless of the format or intention, displayed on any HAMC web site be appropriate. The presentation of any information, posting or portrayal which could effect any other HAMC charter or cites the opinion of HAMC will require a world vote approval prior to insertion onto any HAMC web site.

1. All HAMC charters are able to have a web site, if that charter deems it in that charters best interest.
2. All HAMC charter web sites will be linked to a central link up point, specifically HAMC World. Operated by the World Webmaster.
3. HAMC web sites may sell, lease or otherwise receive payments for advertisements by non-HAMC activities, as a form of revenue for that charter web site.
4. HAMC web sites may establish links, with non HAMC activities/sites, without prior approval unless that non HAMC activity could cause any other HAMC web site or charter concern, at which time a written request for approval would be presented to HAMC world for approval.
5. No information, relative to HAMC as a whole or part, may be presented, on any HAMC web site, without a world vote approval, prior to release of such information.
6. Response(s) to adverse comments by media or other activities will not be made without vote approval by HAMC World.
7. Operation of any HAMC web site will be the responsibility of the respective HAMC charter, financially, for content and compliance with these guidelines.
8. These HAMC World web site guidelines will be reviewed annually.
9. If revision of these guidelines is required, it will be done by world vote manner.
10. Participants of the web site-working group will be posted and attached to the guidelines.

HELLS ANGELS MOTORCYCLE CLUB LINEAGE CLARIFICATION WRITTEN BY HAMCCSC 25 MAY 1999

The myth and legends surrounding the military lineage of the Hells Angels Motorcycle Club has, for decades, been cited as being from former members of the Hell's Angels Bomber B-17 Group from World War II. This myth has been aided by incorrect reporting by authors who deemed it appropriate to align the Hells Angels Motorcycle Club (HAMC) with ex-service members returning from a war where excitement and adventure had become their lifestyle. Authors and newspaper correspondents, from a wide assortment of daily, weekly and other periodicals have made statements, not founded in fact. It has been stated that these former servicemen were alleged to have been drunkards, military misfits, and generally speaking substandard soldiers that would not adjust to a return to a peacetime environment. If any person, regardless of their association considered the content of the statements and inferences made, they would find these to lack any rational thought or concern for truthful reporting.

A historical review of the exploits and accomplishments of the implied Bomber Group, 303rd Bombardment Groups (Heavy) 303rd European Theater of Operations (ETO) shows that this bomber unit did not tolerate malcontents, drunken pilots or aircrews. Such individuals, had they existed, would have seriously hindered the effectiveness of combat operations and would have been dealt with harshly and promptly. Documented records of the 303rd can be found in "Might in Flight", Daily Diary of the Eighth Air Force's Hells Angels, 303rd Bombardment Group (H), by Harry D. Gobrect, LtCol, USAF (Ret). One of the 303rd's most famous B-17's serial number #41-24577, commanded by then Captain Irl Baldwin, was named "Hells Angels". This aircraft was unnamed until it's fourth or fifth mission. The crew decided to adopt the name "Hells Angels" after the 1927 "Hells Angels" WWI fictional Fighter Squadron movie by Howard Hughes. On 13 May 1943 the 303rd's B-17F "Hells Angels". became the first 8th Airforce B-17 to complete 25 combat missions. This feat has wrongly been credited to the "Memphis Belle" B-17 including the 1943 and 1990 "Memphis Belle" movies. The "Memphis Belle" B-17 was the first to complete 25 missions and return to the USA. "Hells Angels" continued to fly combat missions until 13 December 1943, when she completed 48 combat missions it was retired from combat. Shortly thereafter she was flown to the USA, rejoined by members of the Capt. Baldwin Crew, went on a morale boosting tour of war production plants. Hell's Angels B-17 number #41-24577 was dismantled, for scrap, in 1947. On 7. January 1944, by a vote of group and squadron commanders, "Hells Angels" became the name of the 303rd with "Might in Flight" being retained as the Group motto.

- 2 -

Facts which have been undeniably proven, show that the 303rd "Hell's Angels" B-17F was only flown by highly dedicated, motivated and mission oriented airmen. They were not malcontents and did not report for mission in a drunken state. Crew pilot and commander, Capt. Irl Baldwin, completed a stellar military career, retired as a LtCol, and was awarded numerous valorous and meritorious citations.

Records show that the 303rd became one of the 8th Air Forces best Bomb Groups. It operated from Station 107, Molesworth, Huntingdonshire, England from 12 September 1942 until 11 June 1945. During this time the Group flew an 8th Air Force record 364 combat missions, 10721 sorties and dropped 26,346 tons of bombs on enemy targets. The 303rd is credited with 664 enemy aircraft destroyed, probably destroyed or damaged. They sustained 1,748 personnel casualties and lost 210 B-17's on combat missions. The 303rd was the first 8th Air Force Bomb Group to complete 25, 50, 75, 200 and 300 combat missions. With this record doesn't it seem strange that the post war media, more than likely influenced by a law enforcement community biased against the HAMC. Only overzealous sensationalistic reporters, would publish unreliable and malicious comments about 303rd crewmen or any other group, to include HAMC. These tainted reports represent a disservice to journalists that are professional in the execution of their craft.

From available historical information at HAMC Berdoo and extensive research by the 303rd reveals that no lineage exists between the HAMC and the 303rd other than both organizations having the same name. HAMC has copyrighted the name Hells Angels (in any form of spelling) in the US and Internationally, along with all variations of the "Death Head" insignia of HAMC. These trademarks & copyrights are aggressively protected by HAMC, Inc.

The name Hell's Angels was adopted by no less than twelve B-17's throughout WW11, from an assortment of organizations, additionally it was adopted by a B-26 Medium Bomber squadron, a United States Marine Corps fighter squadron and even on a P-38 Lightning fighter.

The former Squadron Leader of the 3rd Pursuit Squadron "Hells Angels" American Volunteer Group (AVG), Arvid Olson, was the only person with specific military lineage to an actual unit which bore the name Hell's Angels that was affiliated with the foundation of the HAMC, which occurred in Fontana, California in March 1948. Arvid Olsen was an associate of the founders of the HAMC, he never attempted to or became a member of HAMC.

42

EXPERT-00000250

- 3 -

The AVG, or more famously known "The Flying Tigers" (the name is credited to a United Press correspondent named McGrath for an article written on 26 December 1941) were a secret United States military operation entity, authorized and approved by then President Franklin D. Roosevelt, on 23 December 1940, under conditions of a SECRET Letter of Approval: refer to Official file 150, FDR Library, Memoranda 1941. The secret approval was only recently declassified in December 1991, after 50 years, when the AVG was awarded the Presidential Unit Citation. Additionally the pilots of the AVG were awarded Distinguished Flying Crosses. Ground crew personnel of the AVG were awarded Bronze Star Medals. After all those years the AVG veterans, that were still alive, received Veterans status from a grateful nation! This acknowledgement seems more like an after thought to an intentional oversight, on the part of the government.

As part of this covert operation, which had been requested by Claire Lee Chennault (a former USAAC pilot instructor and veteran of the 94th "Hat in the Ring" squadron during WWI) on behalf of Chaing Kai-Shek and the Chinese government, who had been at war with the Empire of Japan since 1937. The AVG were to be equipped, organized and deployed, in China, against the Empire of Japan. The AVG received 100 P-40 fighter aircraft. The P-40 were diverted from a shipment to England. The personnel were recruited from active branches of the War Department: the Army, Navy and Marine Corps. Pilots, maintenance, communications, clerical and medical personnel were secretly recruited from active duty units. All documentation, equipment and personnel transfers were processed through and by the Central Aircraft Manufacturing Company (CAMCO), as approved by the US Government. Nothing could then be traced to the United States government, which was not yet in conflict with the Empire of Japan. Chaing Kai-Shek appointed Chennault Commander of the AVG. The AVG was divided into four elements: a headquarters squadron and three (3) fighter squadrons. Each squadron selected their respective name, which was the custom of the time for military aviation units. The First Pursuit Squadron (1PS) became the "Adam & Eve's". The Second Pursuit Squadron (2PS) became the "Panda Bears". Chuck Older, Ken Jerstedt, Tom Haywood and Ed Overend, all former USMC pilots, selected the name "Hells Angels" for the Third Pursuit Squadron (3PS). Of note is that Charles "Chuck" Older, became a judge and presided over the trial of Charles Manson. Ken Jernstedt became a US Senator. Squadron Leader Olsen was not involved in that name selection, however he immediately agreed with therecommendation.

- 4 -

The Tiger Shark motif on the AVG P-40 aircraft was the idea of (3PS) Hells Angels Flight Leader Erik Shilling and (1PS) Adam & Eve Vice Squadron Leader Charles Bond, when they found a British magazine with photographs of an RAAF P-40 in desert camouflage. When the two took the idea to Chennault he wanted the entire Group to adopt the motif. Even today Shilling and Bond claim first for idea and application of the Tiger Shark paint job on the P-40's of the AVG. Erik Shilling actually painted his P-40 first, as Bond had gone off base to acquire the paint, whereas Shilling got paint on the base from Chinese personnel that were painting the Chinese Air Force insignia on the P-40's.

Each of the squadrons, now with an approved name, designed their respective squadron insignia. The Hells Angels decided on a red colored silhouette of a very shapely female with halo and wings outlined in white. Each Hells Angels pilot had his own "Lady" painted on his individual aircraft, subsequently each "Lady" had her own personality. Yet the colors of red on white was the standard for the entire squadron. This same motif and ensignia is used today by active United States Army, Marine Corps and Air Force squadrons, additionally a fighter squadron of the Israeli Air Force.

During the seven month combat operations of the AVG this unit acquired a record of 297 Japanese aircraft destroyed, as confirmed by British and Chinese Intelligence. Other sources have placed the total Japanese aircraft destruction, caused by the AVG, at well over 600 to 900, including aircraft destroyed on the ground during strafing operations. AVG losses were 4 pilots killed in air combat, 7 killed by ground fire, 3 died as a result of Japanese bombing while they were on the ground and 1 missing in action presumed dead. That reflects an AVG to Japanese kill ratio of 50 to 1, a record that has never been equaled. Chennault reviewed official Japanese war records, after the war. The Japanese reported the destruction of 544 AVG aircraft. Of note was the fact that at no time did the AVG possessed more than 100 aircraft in their unit. The AVG was disbanded on 4 July 1942, at which time few accepted returning into the US Army Air Force, most optioned to return to the US where they returned to active service or other war efforts. The reason many refused immediate return to active service, in China, was the manner by which Brigadier General Bissell, USAAF, presented the option to them. Bissell had been a long time adversary of Chennault and the Flying Tigers. Chennault, who had accepted return to active military service, immediately prior to deactivation of the AVG, at the rank of Brigadier General continued to command the 14th Air Force in the China Burma Theater (CBT).

- 5 -

The 14th Air Force all referred to themselves as “Flying Tigers”, even though the real “Flying Tigers” had been deactivated on 4 July 1942. General Chennault was forced into retirement immediately prior to the Japanese surrender. At the official surrender ceremony, about the USS Missouri, General of the Army, Douglas MacArthur asked, “Where’s Chennault?” As a final insult General Chennault, founder and commander of the AVG, who had fought the Japanese Empire since 1937 wasn’t even permitted to be present at the official end of hostilities, of which he had participated in for 8 years, unlike the 4 years of participation by other US officials at that ceremony.

To answer the questions of lineage between HAMC and a military organization is that Arvid Olsen, “Flying Tigers” Hells Angels squadron gave the idea of the name to the actual founder of the Hells Angels Motorcycle Club, in Fontana, California. The selection of our colors, red on white, is a result of the association of Olsen with the HAMC founders, like the insignia of the 3Ps “Hells Angels”. The insignia of the HAMC, our copyrighted Death Head can also be traced to two variant insignia designs, the 85th Fighter Squadron and the 552nd Medium Bomber Squadron. Frank Sadliek, past president of the San Francisco Chapter, HAMC, designed the official “Death Head” insignia. Arvid Olsen died 16 may 1974 in Point Clear, Alabama.

Exhibit 4



HAMC MODESTO CHARTER RULES



- 1) NO PHONES, TABLETS, OR ANY ELECTRONIC DEVICES IN CHURCH.
(EXCEPTION FOR SECRETARY TOOLS)
 - a) \$100 FINE
- 2) DRUGS OR GUNS IN CLUBHOUSE MUST BE ON YOUR PERSON
 - a) \$500 FINE
- 3) A MEMBER MUST BE NOTIFIED IF GOING TO BE LATE TO CHURCH. IF NOT, A
FINE WILL BE ISSUED
 - a) \$25 FINE
- 4) NO SHOW/ NO CALL
 - a) 1ST OFFENSE \$50 FINE
 - b) 2ND OFFENSE ON THE CARPET/\$100 FINE
- 5) DRUGS AND ALCOHOL MUST BE CONTROLLED DURING CHURCH
- 6) KICK OUT REQUIRES ¹⁰⁰~~2/3~~ VOTE
- 7) NEW MEMBER REQUIRES 100% VOTE
- 8) LOSING DEATH HEAD OR ITEM THAT SAYS HELLS ANGELS
 - a) \$100 FINE
- 9) ACTS OF COWARDICE
 - a) KICK OUT
- 10) HITTING A MEMBER WHILE ON THE GROUND

a) \$100-\$1000 FINE DEPENDING ON SEVERITY

11) USING A WEAPON ON A MEMBER

a) KICK OUT

12) MESSING WITH ANOTHER MEMBER'S WOMAN

a) KICK OUT

13) LATER THAN 30 MINUTES TO CHARTER EVENT SET UP OR START TIME

a) \$100 FINE

14) CHARTER EQUIPMENT SUCH AS THE VAN, TOOLS, GENERATOR, ETC... IS FOR CHARTER AND CLUB USE ONLY. NOTHING IS TO BE LOANED OUT TO MEMBERS OR ANYONE FOR PERSONAL USE WITHOUT PERMISSION OF THE CHARTER

15) NO HANGAROUND CAN MAKE PROSPECT BEFORE BACKGROUND CHECK HAS COME BACK.

16) NO GUNS IN CHURCH \$500 FINE

17) ALL CHARTER BUSINESS WILL REMAIN IN THE ROOM AND NOT OUTSIDE THE CHARTER – ON THE CARPET

18) DOWN TIME FOR BIKE JANUARY 1ST – FEBRUARY 14TH. YOU HAVE 2 WEEKS TO HAVE IT UP AND RUNNING OR A FINE WILL BE PUT IN PLACE OF 100\$ A WEEK UNTIL COMPLETED

19) 100\$ A MONTH ALLOWANCE FOR MEMBERS OR ANYONE WITH STATUS INCARCERATED



Exhibit 5

HELLS ANGELS MOTORCYCLE CORPORATION

CORPORATE PROPERTY AGREEMENT

(MEMBER SUB-LICENSE)

I, DUSTIN HARRISON Member of the HELLS ANGELS MOTORCYCLE CLUB's ("HAMC")
CHARTER Charter, hereby expressly acknowledge, and agree with, the
following terms and conditions:

1. All intellectual property comprised in whole or in part of the HELLS ANGELS mark and/or the DEATH HEAD logo belongs solely and exclusively to the Hells Angels Motorcycle Corporation ("HAMC Corp."). This includes, *without limitation*, those marks listed on Exhibit A hereto.

2. Ownership of any and all articles bearing the "HELLS ANGELS" mark and/or the "DEATH HEAD" logo (including, but not limited to, motorcycles, the HELLS ANGELS vest/jacket commonly referred to as "the patch", cloth patches, apparel, jewelry, belt buckles, decals, stickers, etc.) are the sole and legal property of HAMC Corp.

3. The HELLS ANGELS and DEATH HEAD logo marks are used by the HAMC Charters under grant of license from HAMC Corp. Authorized Charters may sub-license appropriate use to their respective Members whom are considered sub-licensees.

4. My use of any article bearing the HELLS ANGELS mark and/or DEATH HEAD logo is authorized by grant of sub-license from the HAMC Charter (Licensee) of which I am a Member.

5. As a Member of an HAMC Charter, I may be permitted to possess, wear, or display articles bearing the HELLS ANGELS mark and/or the DEATH HEAD logo in accordance with the rules of HAMC Corp. and its Charters. Permission to possess, wear and display these articles is granted on a temporary basis and is subject to revocation at any time, with or without cause, at the sole option and discretion of HAMC Corp.

6. Although HAMC Corp. grants me permission to possess, display or wear articles bearing the HELLS ANGELS mark and/or the DEATH HEAD logo, ownership of the mark, logo and the articles upon which the mark &/or logo are affixed remains with HAMC Corp. and in no way vests in me.

7. My possession of any article containing the HELLS ANGELS mark and/or DEATH HEAD logo, whether created by me, for me, or at my direction, merely identifies me as a member in good standing of HAMC and its Licensee Charter and does not constitute legal ownership of the article, which belongs to HAMC Corp.

8. If I am permitted to create, design or manufacture any article that includes or incorporates the HELLS ANGELS mark and/or DEATH HEAD logo, ownership of said item vests solely in HAMC Corp.

EXPERT-00001281

767

9. I shall refrain from using any article bearing the HELLS ANGELS mark or

Death Head logo for any unlawful purpose, including the commission of any criminal act or in furtherance of any criminal enterprise. Such use of the HELLS ANGELS mark or DEATH HEAD logo may be cause for HAMC Corp.'s immediate revocation of my right to possess such property. Such use may also be subject me to further disciplinary action, including without limitation, expulsion from HAMC.

10. Upon termination of my Membership in HAMC, whether voluntarily or

involuntarily, including upon my death, all articles designated by this Agreement to be the legal property of HAMC, shall be immediately relinquished to a duly appointed representative of HAMC, by either me or my surviving heirs.

11. I grant HAMC Corp., its officers and designated legal representatives Power of Attorney to claim or recover any article that includes or incorporates the HELLS ANGELS mark and/or DEATH HEAD logo over which I have exercised possession, whether such article remains in my possession or that of another.

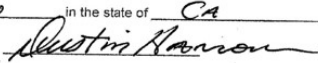
12. I grant HAMC Corp., its officers and designated legal representatives Power of Attorney to sign, correspond or engage in any action necessary to retrieve any and all articles bearing the HELLS ANGELS mark and/or DEATH HEAD logo, acquired or seized by any third party, including any law enforcement officer, agency and/or their representatives.

13. HAMC Corp. and its Licensee Charters have the absolute, irrevocable right to institute any and all legal proceedings necessary to obtain or recover possession of articles bearing the HELLS ANGELS mark and/or DEATH HEAD logo, and I agree to cooperate fully in any proceedings which may be instituted by HAMC Corp. or its Licensee Charters.

Duly EXECUTED this 11 day of June, 2008

County of SAN Diego in the state of CA

 HAMC Charter Authorized

 Member's Signature

Representative's Signature

EXPERT-00001282

Exhibit 6

WAIVER RELEASE AND CONSENT TO COVER TATTOO

PLEASE READ AND BE CERTAIN YOU UNDERSTAND THE IMPLICATIONS OF SIGNING

PLEASE INITIAL ON THE LINES AFTER EACH PROVISION TO SHOW YOU UNDERSTAND EACH PROVISION

In consideration of my choice to cover any and all tattoos related to the HELLS ANGELS MOTORCYCLE CLUB (HAMC) I agree to the following.

That I _____ (clearly print your name) have been fully informed that I am no longer a member of HAMC, and as an ex-member I am not entitled to wear or display any tattoos that would identify me as a member of HAMC. I wish to proceed with the application of cover up tattoos and I freely accept and expressly assume any and all risks that arise from tattooing. _____int

TO WAIVE AND RELEASE to the fullest extent provided by law each of the HAMC, the artist and the tattoo studio from all liability whatsoever, for any and all claims and causes of action that I, my estate, heirs, executors or assigns may have which result or arise from the application of my tattoo. _____int

That HAMC, and the artist have provided full opportunity to ask any and all questions about the application of my tattoo and all questions were answered to my satisfaction. _____int

I am not under the influence of alcohol or drugs and I am voluntarily submitting to be tattooed without duress or coercion. _____int

I do not have a mental impairment that may affect my judgment to be tattooed. _____int

I acknowledge that I have been given adequate opportunity to read and understand this document, that it was not given to me at the last minute and I understand that I am signing a legal contract waiving certain rights to recover against HAMC or the tattoo artist or tattoo studio. _____int

I hereby declare that I am of legal age and I am competent to sign this agreement. _____int

I HAVE READ THIS AGREEMENT, I UNDERSTAND IT AND I AM BOUND TO IT.

FULL NAME _____

SIGNATURE _____

EXPERT-00001279

Exhibit 7

H.A.M.C. WORLD B.H.C. LIST**3/23/2011****#1****UNITED STATES**
CALIFORNIA

BUTCH (Berdo) Lee Frazier B91477
Tehachapi Correctional Institution
Unit 2 Dorm 5-91-L
PO Box 608 - State Prison
Tehachapi, California 93581



POLOCK JOHN (Frisco) John Gzikowski D00666
Ironwood State Prison
P.O. Box 2199
Blythe, California 92226



J.R. (Frisco) Carl Serrano 25526-053
F.C.I. Lompoc E06-0446
3600 Guard Road
Lompoc, California 93436



ANGELO (Oakland) Angelo Trengali 97685-011
Correctional Institution Taft
P.O. Box 7001
Taft, California 93268



JOHN (Oakland) John Wilbur F14783
P.O. Box 2500
Susanville, California 96127-2500



BUCK (Nomads Ca.) Otis Garrett 04796-097
U.S.P. Victorville
P.O. Box 5500
Adelanto, C.A. 92301



DANNY RAY (Nomads Ca) Daniel LaJocies 13857-097
Federal Correctional Institution
37910 N 45th Ave
Phoenix, Arizona 85086



RANDY (Nomads Ca.) Randy Picchi 0660936
40935 MJ 3F 012
P.O. Box 892
Fresno, California 93712



ALBERT (San Jose) Albert Solis V-72145
Cascade 0608-U
P.O. Box 2500
Susanville, Ca. 96127



BRUCE (Sonoma County) Bruce Cooper T43842
San Quentin State Prison
4N100
San Quentin, California 94974



FRANK (Sonoma County) Frank Brady T-91233
23 - G3 -L
P.O. Box 4000
Vacaville, California 95696-4000



TONY (Merced Co.) Tony Aquino V-70170/3126
P.O. 8101
San Luis Obispo California 93409-8101



BOBBY T (Shasta Co) Robert Thompson
ADSEG, cell 6
PO Box 2267
Merced, Ca 95344

**CALIFORNIA (Continued)**

DIRT (Dago) Ronald Liquori Sr. 26246-198
F.C.I. Victorville Unit B-318
P.O. Box 5300
Adelanto, California 92301



BRIAN (Dago) Brian Brewer V-98513 D-1 102L
Kern Valley State Prison
PO Box 5104
Delano, California 93216-5104



GUY (Dago) Guy Castiglione 18036-198
USP Lee County
P.O. Box 305
Jonesville, Virginia 24263-0305



ROCCO (Dago) Rocco Gulatta V83024
Chuckawalla State Prison
P.O. Box 2349
D-9 247- Upper
Blythe, California 92226



NICK (Dago) Frank Carusso 88237-198
U.S.P. Attwater
P.O. Box 19001
Attwater, California 95301



GREG (Dago) Greg Bunch 88230-198
U.S.P. Victorville
P.O. Box 5500
Adelanto, California 92301



WHITEY (Dago) Patrick H Robinson F29678
38-03-L
FCC 5150 Obyrne Ferry Road,
Jamestown California 95327



DAMO (Dago) Daymond Buchanan 85999-198
Mohawk A-114
Federal Correctional Institution
P.O. Box 7007
Marianna, Florida 32447



CHAD (Dago) Chad Wilson 44168
PO Box 5911
Sioux Falls, South Dakota 57117



PAT (prospect Dago) Patrick Haggerty 88235-198
U.S.P. Victorville
P.O. Box 5500
Adelanto, California 92301



D.J. (prospect Dago) Darren Mann V47533 D-9-241-U
Chuckawalla State Prison
PO Box 2349
Blythe, CA 92226

**ARIZONA**

CAL (Mesa) Calvin Brett Schaefer 04913-748
F.C.I. Victorville Medium II
P.O. Box 5700
Adelanto, California 92301



PUFF (Phoenix) Francis Stone 098822
F3-105-2 Union Correctional Institution
7819 NW 228th Street
Raiford, Florida 32026-4140



H.A.M.C. WORLD B.H.C. LIST**3/23/2011****#2****ARIZONA (Continued)**

ROD (Phoenix) Rodney Cox Sr. 257494
City of Las Vegas Detention Center
3300 Stewart Avenue
Las Vegas, Nevada 89101

KEVIN (Mesa) Kevin Augustiniak P155443
Fourth Avenue Jail
201 South Fourth Avenue
Phoenix, AZ 85003

DENNIS (Nomads) Dennis Den Besten 80995-008
Florence State Prison
P.O. Box 6300 **Letter returned 11/02/06**
Florence, Arizona. 85232

SNAKE (Nomads) Greg Surdukan 46164008
FMC Lexington
Federal Medical Center
P.O. Box 14500
Lexington, Kentucky 40512

DOUG (Tucson) Douglas Dam 93273-008
F.C.I. Terminal Island
1299 Seaside Avenue Box 3007
Terminal Island, California 90731

SLUT DOUG (Phoenix) Douglas Wistrom 04986-748
FCI La Tuna
P.O. Box 3000
Anthony, Texas 88021

PEPPI (Phoenix) Gregory Heine 71073-053
F.C.I. Herlong
PO Box 800
Herlong, California 96113

WASHINGTON

SMILIN' RICK (Nomads Washington)
Richard Fabel 11096-006
Federal Detention Center
Unit DC
PO Box 13900
Seattle, Washington 98198

RICKY (Nomads Washington) Ricky Jenks 10908-085
Federal Detention Center
Unit DC
PO Box 13900
Seattle, Washington 98198

NEVADA

CHRIS (Las Vegas) Chris Wilson
F.C.I. Oxford
P.O. Box 1000
Oxford, Wisconsin 53952

MINNESOTA

ROOSTER (Minneapolis) Paul Seydel 01931-041
F.C.I. Waseca
Unit D
PO Box 1731
Waseca, Mn 56093

NEBRASKA

CORKY (Omaha) Dale Haley 02388-016
F.C.I. El Reno
Highway 66
El Reno, Oklahoma 73036

GARY (Omaha) Gary Apker 11233-047
F.C.I. Waseca
Unit A
P.O. Box 1731
Waseca Minnesota

OHIO

FRIZZY (Cleveland) John Bonds 03361-033
F.C.I. Schuykill
P.O. Box 759
Minersville, Pennsylvania 17954-0759

STEVEN (Cleveland) Steven Yee 424-573
North Central Correctional Institution
P. O. Box 1812
Marion, Ohio 43301-1812

MARK (Cleveland) Mark Verdi 424-572
G.C.I.
2500 South Avon-Beldon Road
Grafton, Ohio 44044

ILLINOIS

LOUSY (Chicago) Len Stocki A-71389
RR2
Box 31
Sumner, Illinois 62466

GREASE (Rockford) Michael Deacon N-31689
P.O. Box 1700
Galesburg, Illinois. 61401

NEW YORK

CHANCE (Nomads N.Y.) Chance Heffner 12282-052
FCI-FSL Elkton
P.O. Box 10
Lisbon, Ohio. 44432

DIAMOND DAN (NYC) Daniel Bifield 06833-014
U.S.P Lewisburg
P.O. Box 1000
Lewisburg, Pennsylvania 17837

FRANK (NYC) Frank Tatulli DIN-04A1593
Downstate Correctional Facility
B-Block Cell-9 Box F-
Red Schoolhouse Road
Fishkill, New York 12524-0445

KEVIN (New Roc City) Kevin Lubie 82982-054
FCI Fort Dix West
PO Box 7000 **NL Returned 09/24/06**
Unit 5851
Fort Dix, New Jersey 08640

MARC (New Roc City) Marc Gentile 84138-054
F.C.I. Ray Brook
P.O. Box 300
Ray Brook, New York 12977

H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#3

NEW YORK (Continued)

MATT (New Roc City) Matthew O'Dell 84114-054
FCI Allenwood Unit 2 B
PO Box 2000
White Deer, Pennsylvania 17887

JEFF (New Roc City) Jeff Amato 05A-2529
Coxsacki Correctional Facility
Coxsacki, New York 12051

ED (New York) Edward Hartley 11849-052
U.S.P. Canaan
P.O. Box 300
Waymart, Pennsylvania 18472

FAST EDDIE (Rochester) Edward Weathers 01688-055
Low Security Correctional Institute-Allenwood
P.O. Box 1000
White Deer, Pennsylvania. 17887

NEW JERSEY

SHAGGY (Newark) Thomas Hickman 345908
MacDougall-Walker Correctional Institute
1153 East St. South
Suffield, Connecticut 06080

CONNETICUTT

DANNY (Nomads Ct.) Danny Klimas 279671
Macdougall-Walker Correctional Institute
1153 East St. South
Suffield, Connecticut 06080

MASSACHUSETTES

LUDLOW MIKE (Berkshire Co) Mike Szlosek W83802
500 Clolony Road
P.O. Box 466
Gardner, Massachusettes 01440-0466

JOHNNY BART (Boston) John Bartolomeo 21270-038
USP Lee County
P.O. Box 305
Jonesville, Virginia 24263-0305

GREG (Salem) Greg Domey #21274-038
U.S.P. Canaan E-2
P.O. Box 300
Waymart, Pennsylvania 18472

BIKER DAN (Salem) Dan Lewis 20909-038
P.O. Box 670
Camp 2
Minersville, Pennsylvania 17954

TONY (Salem) Anthony Eicks 21273-038
USP Lewisburg Camp
P.O. Box 2000
Lewisburg, Pennsylvania 17837

CANADA

RICHARD (Trois Riviers) Richard Valle 1018225
R.C.J
PO Box 389
Troy, NY 12180

CANADA (Continued)

MAGEL (Quebec City) Magella Houde
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

BOB (Quebec City) Robert Hudon
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

RICHARD (E.C.C.) Richard Mayrand
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

NURGET (E.C.C.) Walter Stadnick
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

PUP (E.C.C.) Donald Stockford
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

GAET (Montreal) Gaetan Comeau
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

DANIEL (Quebec City) Daniel Hudon
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

ALAIN (Quebec City) Alain Harton
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

LUC (Trois Rivieres) Luc Alaie
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

GUY (South) Guy Dube
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

YVES (South) Yves Leduc
Etablissement Leclerc
400 Montee St. Francois
Laval, QC Canada H7C-1S7

TIM (Thunder Bay) Tim Speak
Stony Mountain Institution
Highway #7 PO Box 4500
Winnipeg, Manitoba R3C 3W8 Canada

MARIO (Thunder Bay) Mario Minier
Stony Mountain Institution
Highway #7 PO Box 4500
Winnipeg, Manitoba R3C 3W8 Canada

CANADA (Continued)

H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#4

DON (Thunder Bay ??) Donald Minier
Story Mountain Institution
Highway #7 PO Box 4500
Winnipeg, Manitoba R3C 3W8 Canada



SHAWN (London Ontario) Shawn Boshaw
Joyceville Institution
Hwy 15, P.O. Box 880
Kingston, Ontario K7L 4X Canada



LUCKY (Nomads Ontario) Brett Simmons
Joyceville Institution
Hwy 15, P.O. Box 880
Kingston, Ontario K7L 4X Canada



MOM (E.C.C.) Maurice Boucher
Regional Reception Center
246 Montee Gagnon
Sainte-Anne-des-Plaines,
Quebec J0N-1H0 Canada



CLAUDE (Trois Rivieres) Claude Giguere
Donnacoma Institution
1528 Rte 138
Donnacoma, QC Canada G0A-1T0



SYLVAIN (Trois Rivieres) Sylvain Thifault
Archambault Institution **NL Returned 09/19/06**
242 Montee Gagnon **marked "Refused by addressee?"**
Sainte-Anne-des-Plaines, Quebec J0N-1H0 Canada



DONAT (Montreal) Jean-Paul Ramsey
Archambault Institution
242 Montee Gagnon
Sainte-Anne-des-Plaines, Quebec J0N-1H0 Canada



PARIS (North Toronto) Paris Christofaru
Collins Bay Institution
1455 Bath Road
PO Box 190
Kingston, Ontario Canada K7L 4V9



JEFF (Keswick) Michael J Mcil Murray 926710B
Warkworth Institution
County Road #29
P.O. Box 760
Campbellford, Ontario K0L 1L0 Canada

**ENGLAND**

K.V. (South West) Gary Wadman P C 8857
HMP Exeter
New North Road
Exeter, Devon EXE-4EX England

**FRANCE**

MARTIN (Nomads France) Martin Lauer
JVA Lerchesflugweg 37
66119 Saarbrücken, Germany



MARCO (Paris) Marc Treize
9431B 2AE Cel 217
C P Route D'Assevent BP239
59603 Maubeuge
Cedex, France

**N.L. Returned 10/26/06****FRANCE (Continued)**

BALLU (prospect Nomads) Christian Wester
JVA Diez
Limburgerstrasse. 122
65582 Diez, Germany



MOUS (prospect Nimes) Oumrani Mostafa
Cellule 193
Ecrou 7858 Bat B
13350 Tarascon, France

**SPAIN**

POCI (Barcelona) David C. Perez
Modulo 2
CP De Cuatre Camins
Apartado 335
08400 Granollers
Barcelona, Spain



SUPER (Barcelona) Alberto Casaus Boada
2 Galeria **N.L. Returned 10/06/06**
Aptd Oficial de correos 20
08080 Barcelona, Spain.



RICHY (Madrid) Jose Luis Alonso Cebrian
Centro Penitenciario Madrid 2
Carretera De Meco KM 5
28805 Alcala de Henares
Madrid, Spain.



DIRK (Lisbon) Dirk Venohr
JVA Düsseldorf
Vogelsangerweg 236
40470 Düsseldorf, Germany



ALFONSO (Madrid) Alfonso Gonzalez Piña
Centro Penitenciario Zuera
Carretera Nacional 330 Km. 539
50800 Zuera
Zaragoza, Spain

**BELGIUM**

JP (Ghent) Jean Paul Mouton
Strafinrichting
Legeweg 200
8200 Brugge, Belgium



EDDY(Ghent) Eddy Werbrouck 9559
Centre Penitentiare
Boite Postal 239
59603 Maubeuge cedex, France.



MEY (Coast) Demey Jean Claude
Strafinrichting
Legeweg 200
8200 Brugge, Belgium

**ITALY**

WEISER (Bolzano) Hubert Weiser
Bolzano's jail
Via Dante, 30
39100 Bolzano Italy



H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#5

GERMANY

CHEMO (Hannover) Dominic Gern
JVA Geeste
Kirschenstraße 15
49744 Geeste



ANDRE (Hannover) Andre Stehnke
JVA Glasmoor
Am Glasmoor 99
22851 Norderstedt, Germany



RUDI (Lahr) Rudi Walter
JVA Freiburg
Hermann-Herderstrasse 8
79104 Freiburg, Germany



RONNY (Mannheim) Zvonko Simic
JVA Darmstadt
Marienburgstrasse 74
64297 Darmstadt, Germany



PRELLI (Munich) Mattias Klüber
JVA Landsberg
Hindenburgring 12
86899 Landsberg, Germany



GERHARD (Konstanz) Gerhard Schaal
JVA Rottenburg
Schloss I
72108 Rottenburg, Germany



GILBERT (Frankfort) Gilbert Grigorenko
JVA Friedberg
Homburgerstrasse 18
61169 Friedberg, Germany



MICHA (Frankfort) Michael Dibowski
JVA
Vor den Löserbecken 4
64331 Weiterstadt, Germany



GERHARD (HAMC) Gerhard Hachenberger
JVA Diez
Limburger Strasse 122
65582 Diez, Germany



RENE (HAMC) Rene Grabowski
JVA Schwalmstadt
Paradeplatz 5
34613 Schwalmstadt-Ziegenhain, Germany



ROLF (HAMC) Rolf Hübner
JVA Darmstadt
Marienburgstrasse 74
64297 Darmstadt, Germany



BEBBI (HAMC) Stephan Laps
JVA Glasmoor
Am Glasmoor 99
22851 Norderstedt, Germany



WILLY (HAMC) Carsten Hertzelt
JVA Billwerder
Dweerlandweg 100
22113 Hamburg, Germany

**GERMANY (Continued)**

ANDREE (West Side) Andree Pröhl
JVA Bremen
Sonnemannstrasse 2
28239 Bremen, Germany



UHU (West Side) Ugur Atak
JVA Bremen
Sonnemannstrasse 2
28239 Bremen, Germany



NILS (Westend) Nils Helmer
JVA Weiterstadt
Vor den Löserbecken 4
64331 Weiterstadt, Germany



SCHLAMPER (Lahr) Dieter Feiszt
JVA Bruchsal
Kislauer Weg 5 / Aussenstelle
76669 Bad Schonborn, Germany



RAUL (Essen) Ralf Rosendahl
JVA Essen
Kravelstrasse 59
45130 Essen, Germany



SIGGI (Essen) Siegfried Vollmer
JVA
Landgerichtstrasse 2-4
47051 Duisburg, Germany



SCHIFER (Reutlingen) Harald Schifer
JVA Tübingen
Doblerstrasse 18
72074 Tübingen, Germany



HOPPE (Nomads)
c/o HAMC Nomads
Greifswalder Strasse 31
10405 Berlin, Germany



THOMAS (Singen) Thomas Quanz
JVA Stammheim
Asperger Straße 60
70439 Stuttgart, Germany



KARSTEN (prospect Essen) Karsten Brüchner
JVA
Goethestrasse 3
47166 Duisburg, Germany

**DENMARK**

FE (Nomads) Jorgen Rinke
Vestre Faengsel
Afd. Vest 1 Postbox 701
2450 Kbh SV. Denmark



KRUDT (Copenhagen) Vagn Schmidt
Vestre Faengsel
Afd. Vest 1
Postbox 701
2450 Kbh SV. Denmark



SVEND (Nomads) Svend E. Holst
Vestre Faengsel
Afd. Vest 1 Postbox 701
2450 Kbh SV. Denmark



3/23/2011

#6

DENMARK (continued)

K (Aalborg) Jesper Kristoffersen
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



NILLER (Aalborg) Niels C. Petersen
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



KENNETH (Aarhus) Kenneth Skovbjerg
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



THOMAS (Randers) Thomas Olesen
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



BRANDERBORG (Randers) Christian Branderborg
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



LUCKY (Randers) Lars Dalgard
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



WISSING (Aalborg) Brian Wissing
Statsfængslet i Østjylland
Afdeling E.
Frodedalsvej 3
8700 Horsens, Denmark



PAYMAN (Randers) Payman Khademi
Aarhus Arrest
Christiansgade 1
postboks 272
8100 Aarhus C, Denmark



PINDEN (Odense) Jan Nielsen
Frederikshavn Arrest
Danmarksgade 6
9900 Frederikshavn, Denmark



MARTIN (Odense) Martin Y. Smith
Odense Arrest
Tinghusgade 2
5000 Odense C, Denmark



TORBEN (Odense) Torben Nielsen
Arresthuseti Næstved
Ramsherred 2
4700 Næstved, Denmark



GRAMMY (Odense) Thomas Gramstrup
Hjørring Arrest
Jernbanegade 12
9800 Hjørring, Denmark



HOLLAND

BASS (Haarlem) Bas Vogel
HVB De Schie
Prof. Jonkersstrat 7 **N.L. Returned 10/06/06**
3041 JL Rotterdam, Holland



MARCO (North Coast) Marco Hilhorst
AFD E Pi Esserheem
Meidoornlaan 38
9341 AD Veenhuizen, Holland



NORWAY

HANS (Hamar) Hans Mikkelsen
Ullersmo fengsel
Postboks 2,
2040 Kløfta, Norway



EKERN (Hamar) Roger Ekeberg
Ullersmo fengsel
Postboks 2,
2040 Kløfta, Norway



LARS (Oslo) Lars Sverre Dalby
Ullersmo fengsel
Postboks 2,
2040 Kløfta, Norway



LUFFE (Oslo) Leif Olav Thoen
Ullersmo Fengsel
Postboks 2
2040 Kløfta, Norway



ROTTA (Oslo) Torkjell Alsaker
Ullersmo Fengsel
Ullersmovn.
Postboks 2
2040 Kløfta, Norway



ARNE (Oslo) Arne Vorkinslien
Ullersmo Fengsel
Ullersmovn.
Postboks 2,
2040 Kløfta, Norway



JAN (Oslo) Jan Hexeberg
Kongsvinger Fengsel
Vardaasveien 53
2012 Kongsvinger, Norway



HYPER (Hamar) Roger Elvsveen
Ullersmo Fengsel
Ullersmovn.
Postboks 2
2040 Kløfta, Norway



MORTEN (Hamar) Morten Hoelstad
Hamar Fengsel
Gronnegata 131
Postboks 590
2304 Hamar, Norway



LEIF (Trondheim) Leif Ivar Kristiansen
Tromsøe Krets fengsel
Box 3260
9275 Tromsøe, Norway



H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#7

FINLAND

PASI (Nomads) Pasi Törmänen
Helsingin Vankila
PI 40
00581 Helsinki, Finland

**SWEDEN**

ERIK (Karlstad) Erik Moberg
KVA Storboda
195 95 Roserberg, Sweden



PATTEN (Karlstad) Patrik Karlsson
Kronobergshäktet
Box 12106
102 23 Stockholm, Sweden



HJORT (Karlstad) Stefan Hjorth
Häktet Karlstad
Box 61
651 03 Karlstad, Sweden



DANI (Stockholm) Dani Virtanen
KVA Svartsjö
179 05 Svartsjö, Sweden



RUNE (Malmö) Rune Nilsson
Anstalten Kolmården
Torsvägen
618 33 Kolmården, Sweden



MIKA (Stockholm) Mika Touminen
KVA Svartsjö
179 05 Svartsjö, Sweden



JOHAN (Prospect Stockholm) Johan Bergh
Kronobergshäktet
Box 12106
102 23 Stockholm, Sweden



ANTE (prospect Eastside) Anders Björkman
KVA Kolmården
Torsvägen **N.L. Returned 08/22/06**
618 33 Kolmården, Sweden

**NEW ZEALAND**

LAWRENCE (Auckland) Lawrence Bradley
West Division
Wing 3
P.O. Box 50-124
Auckland, New Zealand

**AUSTRALIA**

YOUNG RAY (Nomads) Raymond O'reilly
Metropolitan Remand Center
P.O. Box 500
St. Albans 3021
Victoria, Australia



PETER (Sidney) Peter Zervas 315433
Silverwater Correctional Center
Locked Mail Bag 115 Business Center
Silverwater Australia 1811

**AUSTRALIA (Continued)**

JAMES (Darwin) James Knight
GPO Box 1407
Darwin 0801 Australia



PETER (City Crew) Peter Rickeby 392652
Parklea Correctional Delivery Centre
Box 6148
Blacktown 2148 NSW Australia



SAM (prospect City Crew) Sam Cantali 265210
Silverwater Correctional Center
Locked Mail Bag 115 Business Center
Silverwater Australia 1811

**BRAZIL**

JORGE (Rio) Jorge Diogo Magalhães
Presídio: Esmeraldino Bandeira
Estrada Emilio Maurell Filho 400 **NL Returned 11/17/06**
Bangú - Rio de Janeiro - Brazil CEP: 21854-010



H . A . M . C . W O R L D B . H . C . L I S T

3/23/2011

#8

ANNIVERSARY & PROJECTED RELEASE DATES

BUTCH (Berdo) Lee Frazier Anniversary date: 11/01/67 Projected Realease Date: Life ??	Anniversary date: 12/02/01 Projected Release Date:
POLOCK JOHN (Frisco) John Gzikowski Anniversary date: 01/17/86 Projected Realease Date: 12/21/04	GUY (Dago) Guy Castiglione Anniversary date: 12/30/72 Projected Realease Date:
J.R. (Frisco) Carl Serrano Anniversary date: 03/05/82 Projected Realease Date:	NICK (Dago) Nick Carusso Anniversary date: 09/05/02 Projected Release Date:
J.P. (Frisco) Jason Peterson Anniversary date: Projected Realease Date:	GREG (Dago) Greg Bunch Anniversary date: Projected Realease Date:
BRUCE (Sonoma County) Bruce Cooper Anniversary date: 12/16/93 Projected Realease Date:	WHITEY (Dago) Patrick H Robinson Anniversary date: Projected Release Date:
FRANK (Sonoma County) Frank Brady Anniversary date: 08/07/92 Projected Realease Date: 01/01/09	DAMO (Dago) Daymond Buchanan Anniversary date: Projected Realease Date:
BUCK (Nomads California) Otis Garrett Anniversary date: 03/28/73 Projected Realease Date:	CHAD (Dago) Chad Wilson 44168 Anniversary date: Projected Release Date:
DANNY RAY (Nomads Ca) Daniel LaJocies Anniversary date: Projected Realease Date: 03/19/07	PAT (prospect Dago) Patrick Haggerty Anniversary date: Prospect Projected Realease Date: Sept. 15, 2007
RANDY (Nomads Ca.) Randy Picchi Anniversary date: Projected Realease Date:	D.J. (prospect Dago) Darren Mann Anniversary date: Prospect Projected Release Date: 10/01/09
ALBERT (San Jose) Albert Solis Anniversary date: Projected Realease Date:	SMILIN' RICK (Nomads Washington) Richard Fabel Anniversary date: Projected Release Date:
TONY (Merced Co.) Tony Aquino Anniversary date: Projected Realease Date:	RICKY (Nomads Washington) Ricky Jenks Anniversary date: Projected Release Date:
ANGELO (Oakland) Angelo Trangali Anniversary date: Projected Realease Date:	CAL (Phoenix) Calvin Brett Schaefer Anniversary date: Projected Realease Date:
JOHN (Oakland) John Wilbur Anniversary date: 09/03/04 Projected Realease Date: 10/24/07	PUFF (Phoenix) Francis Stone Anniversary date: 10/18/97 Projected Release Date:
BOBBY T (Shasta Co) Robert Thompson Anniversary date: Projected Realease Date:	ROD (Phoenix) Rodney Cox Sr. Anniversary date: Projected Release Date:
DIRT (Dago) Ronald Liquori Sr. Anniversary date: 02/22/80 Projected Realease Date: Life	KEVIN (Mesa) Kevin Augustiniak Anniversary date: 10/18/00 Projected Release Date:
BRIAN (Dago) Brian Brewer Anniversary date: 05/02/01 Projected Realease Date: 10/ /2154	DENNIS (Nomads Arizona) Dennis Den Besten Anniversary date: Projected Release Date:
ROCCO (Dago) Rocco Gulatta	SNAKE (Nomads Arizona) Greg Surdukan Anniversary date: 11/28/98

H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#9

Projected Realease Date: 07/25/14	Projected Realease Date:
DOUG (Tucson) Douglas Dam	MATT (New Roc City) Matthew O'Dell
Anniversary date:	Anniversary date:
Projected Realease Date: 05/10/08	Projected Realease Date:
SLUT DOUG (Phoenix) Douglas Wistrom	JEFF (New Roc City) Jeff Amato
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
PEPPI (Phoenix) Gregory Heine	ED (New York) Edward Hartley
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
CHRIS (Las Vegas) Chris Wilson 05867-090	FAST EDDIE (Rochester) Edward Weathers
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
CORKY (Omaha) Dale Haley	SHAGGY (Newark) Thomas Hickman
Anniversary date: 05-15-69	Anniversary date:
Projected Realease Date: 3-19-08	Projected Realease Date:
GARY (Omaha) Gary Apker	LUDLOW MIKE (Berkshire Co) Mike Szlosek
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
ROOSTER (Minneapolis) Paul Seydel	JOHNNY BART (Salem) John Bartolomeo
Anniversary date:	Anniversary date: 01/01/96
Projected Realease Date:	Projected Realease Date: 07/27/27
FRIZZY (Cleveland) John Bonds	GREG (Salem) Greg Domey
Anniversary date: 04/08/88	Anniversary date: 06/26/80
Projected Realease Date:	Projected Realease Date:
STEVEN (Cleveland) Steven Yee	BIKER DAN (Salem) Dan Lewis
Anniversary date: 06/28/84	Anniversary date:
Projected Realease Date:	Projected Realease Date:
MARK (Cleveland) Mark Verdi	TONY (Salem) Anthony Eicks
Anniversary date: 05/20/88	Anniversary date: 11/21/95
Projected Realease Date:	Projected Realease Date:
LOUSY (Chicago) Len Stocki	DANNY (Nomads Ct.) Danny Klimas
Anniversary date: 12/02/94	Anniversary date: 01/05/95
Projected Realease Date:	Projected Realease Date:
GREASE (Rockford) Michael Deacon	JOHN (North Beach) John Anthony Beal
Anniversary date: 12/02/94	Anniversary date:
Projected Realease Date:	Projected Realease Date:
CHANCE (Nomads New York) Chance Heffner	RICHARD (Trois Riviers) Richard Valle
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
DIAMOND DAN (NYC) Daniel Bifield	MAGEL (Quebec City) Magella Houde
Anniversary date: 02/17/75	Anniversary date:
Projected Realease Date:	Projected Realease Date:
FRANK (NYC) Frank Tatulli	BOB (Quebec City) Robert Hudon
Anniversary date: 06/14/00	Anniversary date: 05/26/88
Projected Realease Date: 09/ /12	Projected Realease Date:
KEN (New Roc City) Kevin Lubic	DONAT (Montreal) Jean Paul Ramsey
Anniversary date:	Anniversary date: 03/01/87
Projected Realease Date:	Projected Realease Date:
MARC (New Roc City) Marc Gentile	RICHARD (Quebec City) Richard Mayrand
Anniversary date:	Anniversary date:

H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#10

Projected Realease Date:	Projected Realease Date:
WALTER (Quebec City) Walter Stadnick	LUCKY (Nomads Ontario) Brett Simmons
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
PUP (Quebec City) Donald Stockford	MICHAEL (Keswick) Michael J Mcilmurray
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
MOM (Quebic City) Maurice Boucher	K.V. (South West) Gary Wadman
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
CLAUDE (Quebec City) Claude Giguere	VINCENT (Cote D'Azure) Vincent Pelat
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
GAET (Montreal) Gaetan Comeau	MARCO (Paris) Marc Treize
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
RICHARD (Trois Rivieres) Richard Valle	BALLU (prospect Lorraine) Christian Wester
Anniversary date:	Anniversary date: Prospect
Projected Realease Date:	Projected Realease Date:
DANIEL (Quebec City) Daniel Hudon	MOUS (prospect Nimes) Oumrani Mostafa
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
ALAIN (Quebec City) Alain Harton	WEISER (Bolzano) Karl-Heinz Weiser
Anniversary date:	Anniversary date: 08/26/00
Projected Realease Date:	Projected Realease Date:
LUC (Trois Rivieres) Luc Alaire	POCI (Barcelona) David C. Perez
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
GUY (South) Guy Dube	DIRK (Lisbon) Dirk Venohr
Anniversary date:	Anniversary date: 11/12/99
Projected Realease Date:	Projected Realease Date:
YVES (South) Yves Leduc	ALFONSO (Madrid) Alfonso Gonzalez Piña
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
SYLVAIN (Trois Rivieres) Sylvain Thifault	SUPER (Barcelona) AlbertoCasas Boada
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
SHAWN (London Ontario) Shawn Boshaw	RICHY (Madrid) Jose Luis Alonso
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
PARIS (North Toronto) Paris Christofaru	JP (Ghent) Jean Paul Mouton
Anniversary date:	Anniversary date: 07/15/97
Projected Realease Date:	Projected Realease Date:
TIM (Thunder Bay) Tim Speak	EDDY (Ghent) Eddy Werbrouck
Anniversary date:	Anniversary date: 12/30/03
Projected Realease Date:	Projected Realease Date:
MARIO (Thunder Bay) Mario Minier	MEY (Coast) Demey Jean Claude
Anniversary date:	Anniversary date:
Projected Realease Date:	Projected Realease Date:
DON (Thunder Bay) Donald Minier	CHEMO (Hannover) Dominic Gern
Anniversary date:	Anniversary date: 11/12/99
Projected Realease Date:	Projected Realease Date:

H . A . M . C . W O R L D B . H . C . L I S T

3/23/2011

#11

ANDRE (Hannover) Andre Stehnke**Anniversary date:** 12/13/02**Projected Release Date:****RUDI (Lahr) Rudi Walter****Anniversary date:** 01/03/03**Projected Release Date:****RONNY (Mannheim) Zwonko Simic****Anniversary date:** 02/02/00**Projected Release Date:****PRELLI (HAMC Munich) Mattias Klüber****Anniversary date:** 12/14/02**Projected Release Date:****GERHARD (Konstanz) Gerhard Schaal****Anniversary date:** 11/29/02**Projected Release Date:****GILBERT (HAMC) Gilbert Grigorenko****Anniversary date:** 11/12/99**Projected Release Date:****MICHA (Frankfort) Michael Dibowski****Anniversary date:** 11/01/03**Projected Release Date:****GERHARD (HAMC) Gerhard Hachenberger****Anniversary date:** 11/12/99**Projected Release Date:****RENE (HAMC) Rene Grabowski****Anniversary date:** 11/12/99**Projected Release Date:****ROLF (HAMC) Rolf Hübner****Anniversary date:** 11/12/99**Projected Release Date:****BEBBI (HAMC) Stephan Laps****Anniversary date:** 12/09/94**Projected Release Date:****WILLY (HAMC) Carsten Hertzfel****Anniversary date:** 11/20/92**Projected Release Date:****ANDREE (West Side) Andree Pröhl****Anniversary date:** 10/14/06**Projected Release Date:****UHU (West Side) Ugur Atak****Anniversary date:** 09/14/02**Projected Release Date:****NILS (Westend) Nils Helmer****Anniversary date:** 05/16/06**Projected Release Date:****SCHLAMPER (Lahr) Dieter Feiszt****Anniversary date:** 05/08/06**Projected Release Date:****RAUL (Essen) Ralf Rosendahl****Anniversary date:** 01/21/05**Projected Release Date:****SIGGI (Essen) Siegfried Vollmer****Anniversary date:** 01/19/05**Projected Release Date:****HOPPE (Nomads)****Anniversary date:****Projected Release Date:****THOMAS (Singen) Thomas Quanz****Anniversary date:** 05/19/06**Projected Release Date:****SCHIFER (Reutlingen) Harald Schifer****Anniversary date:** 10/2/5/00**Projected Release Date:****KARSTEN (prospect Essen) Karsten Brüchner****Anniversary date:** Prospect**Projected Release Date:****FE (Nomads Denmark) Jorgen Nielsen****Anniversary date:** 11/06/93**Projected Release Date:****KRUDT (Copenhagen) Vagn Schmidt****Anniversary date:** 12/31/87**Projected Release Date:****SVEND (Nomads Denmark) Svend E. Holst****Anniversary date:** 01/04/96**Projected Release Date:****K (Aalborg) Jesper Kristoffersen****Anniversary date:** 07/27/02**Projected Release Date:****NILLER (Aalborg) Niels C. Petersen****Anniversary date:****Projected Release Date:****THOMAS (Randers) Thomas Olesen****Anniversary date:** 11/02/02**Projected Release Date:****BRANDERBORG (Randers) Christian Branderborg****Anniversary date:** 11/02/02**Projected Release Date:****LUCKY (Randers) Lars Dalgard****Anniversary date:** 09/01/01**Projected Release Date:****WISSING (prospect Aalborg) Brian Wissing****Anniversary date:** Prospect**Projected Release Date:****PAYMAN (Randers) Payman Khademi****Anniversary date:****Projected Release Date:****KENNETH (Aarhus) Kenneth Skovbjerg****Anniversary date:****Projected Release Date:****PINDEN (Odense) Jan Nielsen****Anniversary date:****Projected Release Date:**

H.A.M.C. WORLD B.H.C. LIST

3/23/2011

#12

MARTIN (Odense) Martin Y. Smith**Anniversary date:****Projected Release Date:****TORBEN (Odense) Torben Nielsen****Anniversary date:****Projected Release Date:****GRAMMY (Odense) Thomas Gramstrup****Anniversary date:****Projected Release Date:****PASI (Nomads) Pasi Törmänen****Anniversary date:****Projected Release Date:****ERIK (Karlstad) Erik Moberg****Anniversary date:****Projected Release Date:****PATTEN (Karlstad) Patrik Karlsson****Anniversary date:****Projected Release Date:****HJORT (Karlstad) Stefan Hjorth****Anniversary date:****Projected Release Date:****DANI (Stockholm) Dani Virtanen****Anniversary date:****Projected Release Date:****RUNE (Malmö) Rune Nilsson****Anniversary date:****Projected Release Date:****MIKA (Stockholm) Mika Touminen****Anniversary date:****Projected Release Date:****JOHAN (Prospect Stockholm) Johan Bergh****Anniversary date:****Projected Release Date:****ANTE (prospect Eastside) Anders Björkman****Anniversary date:** Prospect**Projected Release Date:****EKERN (Hamar) Roger Ekeberg****Anniversary date:** 05/08/99**Projected Release Date:****HANS (Hamar) Hans Mikkelsen****Anniversary date:** 05/08/99**Projected Release Date:****MORTEN (Hamar) Morten Hoelstad****Anniversary date:** 05/08/99**Projected Release Date:****HYPER (Hamar) Roger Elvsveen****Anniversary date:** 05/08/99**Projected Release Date:****LARS (Oslo) Lars Sverre Dalby****Anniversary date:** 01/18/00**Projected Release Date:****ARNE (Oslo) Arne Vorkinslien****Anniversary date:**

09/14/96

Projected Release Date:**JAN (Oslo) Jan Hexeberg****Anniversary date:**

10/22/02

Projected Release Date:**LUFFE (Oslo) Leif Olav Thoen****Anniversary date:**

09/14/03

Projected Release Date:**ROTTA (Oslo) Torkjell Alsaker****Anniversary date:**

09/14/96

Projected Release Date:**LEIF (Trondheim) Leif Ivar Kristiansen****Anniversary date:**

08/01/92

Projected Release Date:**ESPEN (Oslo) Espen Juliussen****Anniversary date:**

07/08/03

Projected Release Date:**BASS (Haarlem) Bass Vogel****Anniversary date:****Projected Release Date:****MARCO (North Coast) Marco****Anniversary date:****Projected Release Date:****YOUNG RAY (Nomads) Raymond Oreily****Anniversary date:****Projected Release Date:****PETER (Sidney) Peter Zervas****Anniversary date:****Projected Release Date:****JAMES (Darwin) James Knight****Anniversary date:****Projected Release Date:** 02/05/07**PETER (CityCrew) Peter Rickeby****Anniversary date:****Projected Release Date:****SAM (prospect CityCrew) Sam Cantali****Anniversary date:**

Prospect

Projected Release Date:**LAWRENCE (Auckland) Lawrence Bradley****Anniversary date:**

12/27/05

Projected Release Date:**JORGE (Rio) Jorge Diogo Magalhães****Anniversary date:**

12/23/00

Projected Release Date:

12/00/10

Exhibit 8

STATE OF SOUTH DAKOTA)
) SS.
COUNTY OF MEADE)

IN CIRCUIT COURT
MAGISTRATE DIVISION
FOURTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA)

Plaintiff,)

vs.)

AFFIDAVIT IN SUPPORT OF
REQUEST FOR SEARCH WARRANT

Michael Ryan Fitzpatrick)

DOB: [REDACTED])

Milo L. Campbell)

DOB: [REDACTED])

Defendant.)

The undersigned, Agent John Griswold, being duly sworn upon oath, respectfully requests a Search Warrant to be issued for the following property:

- Major case prints from Michael Fitzpatrick and Milo Campbell
- Photographs of Michael Fitzpatrick and Milo Campbell

The undersigned respectfully requests that the Search Warrant be issued to permit a search at the following premises for the above-described property:

- The person of Michael Fitzpatrick
- The person of Milo Campbell


The undersigned requests a Search Warrant to be issued because the above-described property is:

(PLACE INITIALS IN THE APPROPRIATE BLANK)

 AG Property that constitutes evidence of the commission of a criminal offense;

 Contraband, the fruits of crime, or things otherwise criminally possessed;

0803258


 Properly designed or intended for use in, or which is or has been used as the means of committing a criminal offense.


The undersigned requests:

(PLACE INITIALS IN THE APPROPRIATE BLANKS)

____ Execution of Search Warrant at night pursuant to 23A-25-4.

____ That no notice be given prior to the execution of Search Warrant pursuant to SDCL 23A-35-9.

 Authorization to serve the Search Warrant on Sunday;

 Execution of the Search Warrant during the daytime.

The facts in support of the issuance of a Search Warrant are as follows:

I, John Griswold, am a Special Agent with the South Dakota Division of Criminal Investigation and have been so employed for over 8 years. I am currently assigned to the Rapid City office conducting criminal and drug investigations and have completed training for this position. I have been involved in investigations that include homicides, aggravated assaults, firearms violations and conducting investigations into drug crimes.

On 8-9-08 at approximately 1:00AM, a shooting took place at the Loud American Road House which is a bar/restaurant on Main Street of Sturgis, SD. Investigation has revealed that Michael Fitzpatrick and Milo Campbell were involved in an altercation in the bar. Witness interviews indicated that Fitzpatrick and Campbell were actively engaged in fighting with members of the Iron Pigs motorcycle club. Fitzpatrick and Campbell were identified as members of the Hells Angels motorcycle club.

During the Altercation, a member of the Iron Pigs drew a handgun and shot a member of the Hells Angels. The Hells Angels member that was shot is not Fitzpatrick or Campbell.

Attempted interviews with Fitzpatrick and Campbell resulted in both individuals requesting an attorney. Both Fitzpatrick and Campbell are not being detained by law enforcement at this time.

Investigation has revealed that member(s) of the Iron Pigs motorcycle club were involved in a fight with Fitzpatrick and Campbell. Both Fitzpatrick and Campbell were detained in close proximity of where the altercation took place.

Based on my training and experience, I know that an individual involved in a fight may have injuries on areas of his/her body which would include bruising, scratches, or other types of markings/injuries visible to the naked eye. These types of injuries can be documented by photography. Interviews of witnesses in this investigation reveal that the fight involving the mentioned parties was of a physical nature in that the parties were punching and wrestling. Witnesses also report that individuals involved in the fight were falling or wrestling on the floor which further reiterates the possibility of visible markings/injuries on Fitzpatrick and Campbell.

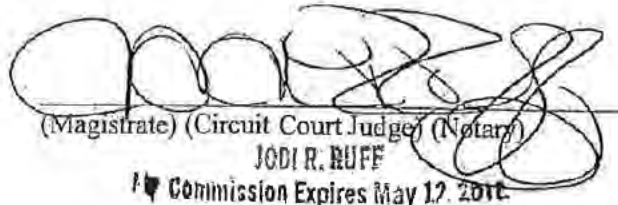
Major case prints of Fitzpatrick and Campbell will be utilized in the further investigation of this incident. Major case prints will provide comparison quality prints to prove or disprove handling of items recovered at the crime scene.

Your Affiant requests a Search Warrant to be issued for the above listed items to aid in this investigation.



Signature of Affiant
Special Agent John Griswold
Official Title

Subscribed and sworn to before me, in my presence, this 9th day of August 2008.



(Magistrate) (Circuit Court Judge) (Notary)
JODI R. RUFF
My Commission Expires May 12, 2011

Exhibit 9



DEATHHEAD PURPLE HEART



Any member who has earned the
DEATHHEAD PURPLE HEART
has given his blood, in the
Defense and Honor of the
HELLS ANGELS MOTORCYCLE CLUB,
and shall forever be revered
by his fellow members

AFFA

Exhibit 10

HAMC Charter IP License Schedule B: Charter Certificate

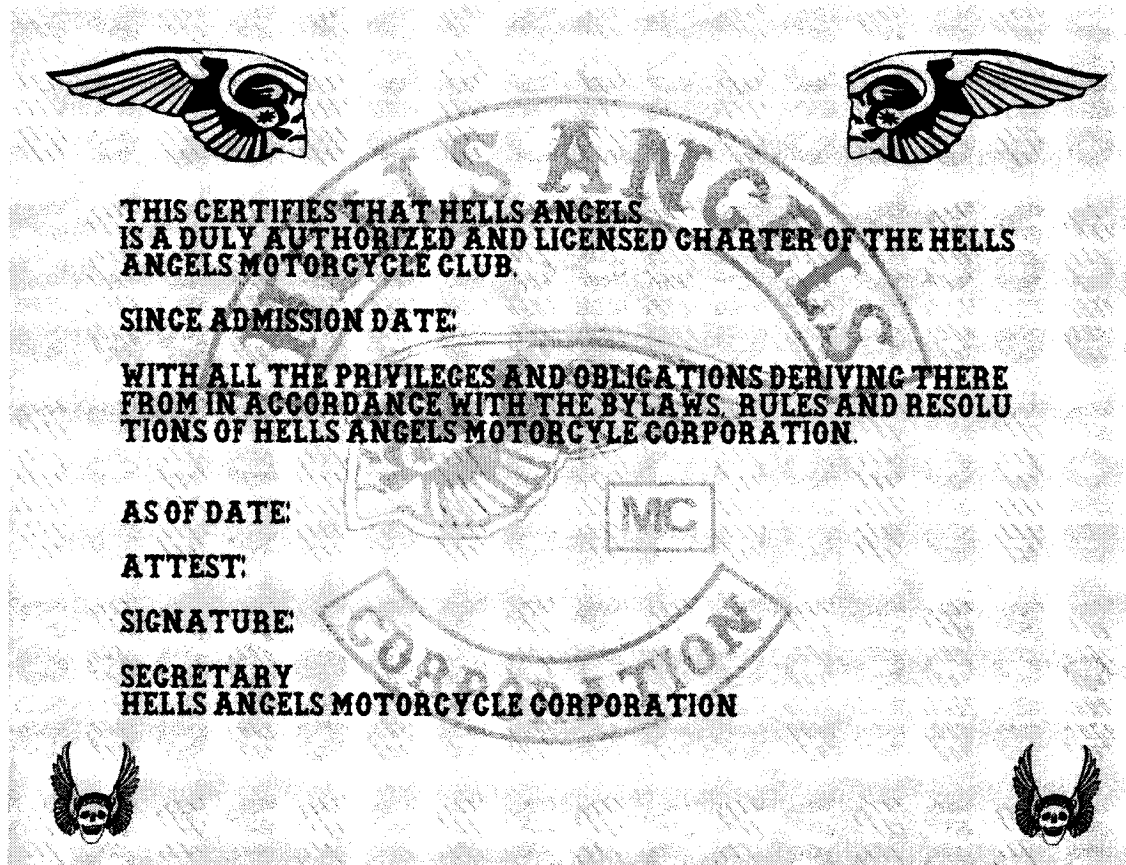


Exhibit 11

OUT OF CLUB

SAN JOSE

Charter



Member



Prospect



Hangaround

CHRIS KNOWLTON

Name

'BIG CHRIS'

A.K.A.



Address

6-8-17

Date Out

LEFT- NO CONTACT

Reason

Additional Info



DRIVERS LISCENSE

OUT OF CLUB

FRESNO

Charter



Member



Prospect



Hangaround



KIRK ALLEN PURCARO

Name

N/A

A.K.A.



Address

Address

12-12-14

Date Out

OUT

Reason

Additional Info



OUT OF CLUB

Santa Cruz California

Charter

☐

Member

☒

Prospect

☐

Hangaround

Glen Gilbert

Name

A.K.A.

Email

Address

Address

03-20-2014

Date Out

Out

Reason

Additional Info



DRIVERS LISCENSE

OUT OF CLUB

SFV

Charter



Member



Prospect



Hangaround

Colby Stoker
Name



Date Out

Conduct Unbecoming
Reason

NO CONTACT

Additional Info



- HE LOST HIS LICENSE -

DRIVERS LICENSE #



SUMMARY OF EVENT:

On March 14-15, 2009, ATF undercover agents and confidential sources met with Members of the OUTLAWS MOTORCYCLE CLUB (OUTLAWS MC) from North Carolina, South Carolina and Virginia. During this meeting undercover agents attended the Regional Bosses meeting, which took place in Hopewell, Virginia. Additionally, undercover agents and confidential sources were present when Members of the OUTLAWS MC planned and carried out an assault on Members of the DESPERADOS MC, a HELLS ANGELS MC affiliate club. This assault took place in Petersburg, Virginia. Several Members of the OUTLAWS MC came armed with firearms to commit this assault.

NARRATIVE:

1. On March 11, 2009, ATF Special Agent (SA) Jeff Grabman, while working in an undercover capacity, was contacted by Les WERTH, OUTLAWS MC COPPER REGION PRESIDENT. During this telephone conversation, WERTH told SA Grabman that he (WERTH) and approximately 5 other OUTLAWS MC Members from North and South Carolina would be coming to the Richmond, Virginia area on Saturday, March 14, 2009. WERTH told SA Grabman that they had business that they had to discuss.
2. Shortly after this conversation, SA Grabman contacted Mark FIEL, AKA SNUFF, MANASSAS/Front Royal, VIRGINIA OUTLAWS MC PRESIDENT by telephone. During this conversation, SA Grabman informed FIEL that WERTH had contacted him (SA Grabman) and that WERTH and others were coming to the Richmond area on Saturday. FIEL stated that he already knew about the planned meeting and would see SA Grabman at his (SA Grabman's) residence on Saturday. SA Grabman had a later conversation with FIEL on March 12, 2009, during which FIEL told SA Grabman that WERTH and the other OUTLAW MC Members were meeting in Richmond to conduct the Regional Bosses meeting, where WERTH would discuss everything that was talked about at the National meeting held in Daytona, Florida during the recent March bike week. FIEL added that these members were also going to be in Richmond to show support for the Richmond chapter. FIEL also told SA Grabman that he (FIEL) had spoken to Charles LOVE, AKA REBAR, PRESIDENT of the RICHMOND, VIRGINIA Chapter of the PAGAN's MC (PMC) and told LOVE that several Members of the OUTLAWS MC from out of state would be in the Richmond area on Saturday.
3. On March 13-14, SA Grabman was contacted several times by LOVE by telephone. During these conversations, LOVE stated that he too had PMC Members from outside the Richmond area in town, as a show of support and to assault members of the HAMC and their affiliate clubs if they came into the Southern Star bar, located in Colonial Heights, Virginia. LOVE asked SA Grabman to meet with himself and other PMC Members when the OUTLAWS MC Members from out of state came into town.
4. On March 14, 2009, ATF SA's Grabman, Dan Ozbolt and Thomas Anderson, along with two ATF Confidential Sources, met with the following OUTLAWS MC Members:
 - Les WERTH – COPPER REGION PRESIDENT
 - Mike MARIACA, AKA M & M – PRESIDENT of the ROCK HILL, SC CHAPTER
 - Mike SMITH – PRESIDENT of the LEXINGTON, NC CHAPTER
 - Harry MCCALL – VICE PRESIDENT CHARLOTTE, NC CHAPTER
 - Christopher TIMBERS, AKA ALIBI – MEMBER MANASSAS, VIRGINIA CHAPTER
 - Lyle BEATTY, AKA BUTCHY- MEMBER MANASSAS, VIRGINIA CHAPTER
 - William DAVEY, AKA REBEL – MEMBER ASHVILLE, NC CHAPTER
5. During this meeting at the undercover residence in Hopewell, Virginia, WERTH stated that he wanted SA Grabman to locate a hotel where they could conduct the Regional Meeting. It was made apparent that the OUTLAWS were concerned about locations being bugged by law enforcement and stated that they wanted to do it at another location. It was later told to undercover agents that Bosses Meetings are always held in a

6. While at the undercover residence, the Members of the OUTLAWS that were present stated that they had come to Richmond to conduct this meeting, in part because they wanted to take the opportunity to come to Virginia to find and assault Members and associates of the HELLS ANGELS MC (HAMC) and their support clubs. Undercover agents were asked to describe the membership and strength of the HAMC and their support clubs, to include where the local establishments were that they frequent. The undercover agents were told that following the Regional Meeting, Members of the OUTLAWS were going to be going out in the Richmond area to find and assault these HAMC Members and support club members. Additional details of this conversation are contained on the audio/video CD recording made at the undercover residence, which has been placed into ATF Evidence as Item #E-088.
7. The regional Meeting was held in room 327 at the Fairfield Inn, located in Hopewell, Virginia. During the course of this meeting, which WERTH ran, issues that were presented at the National meeting were discussed, to include:
 - The OUTLAWS currently have 526 Members, and 50 new Members since December of 2008.
 - Rochester, IL has a new Black Piston Chapter
 - Mt. Vernon, IL has a new Black Piston Chapter
 - "BOBBY" from Peoria, IL is out of the club
 - "ROAD HOG" from Indiana quit the club
 - Member need to write more letters to Members in Prison, so they feel needed and do not cooperate with law enforcement
 - Absolutely no pictures on any websites of Outlaw members
 - The OUTLAWS in Orlando have a new clubhouse
 - "POCKETS" from Pensacola, FL was arrested by the "Feds" for a fight
 - New OUTLAWS Prospect Chapter in Cleveland, TN
 - The OUTLAWS are not going to attend the National NCOM meeting this year
 - The OUTLAWS now have 89 Chapters, in 1992 they only had 27 Chapters
 - The Wilkesburg, PA Chapter of the OUTLAWS was raided approximately a week ago by the "Feds".
 - The New York NIGHT RIDERS MC has patched over to become HELLS ANGELS MC Members.
 - "RANDY" from Columbus, OH Chapter quit the club
 - The ANIMALS MC from Pennsylvania are now an official OUTLAWS Affiliate Club
 - Need to be cautious around the black WHEELS OF SOUL MC Members, some OUTLAWS ok with them others are not
 - If a Members fails to defend his patch or is "punked out" while wearing his patch, he will have his 1%er Diamond cut off his colors because he embarrassed the club
 - "DOMINICH" will be "off-paper" soon.
 - The HIGHLAND CLAN MC, which is an OUTLAW support club from Wisconsin/Northern Michigan, opened a new chapter in Ohio.
 - BLACK HAWKS MC in Martinsburg, IN is an official OUTLAWS support club
 - MINYUNS MC in Anderson, IN is now an official OUTLAWS support club
 - As of now, the OUTLAWS are not going to the "SMOKEOUT" at the Rockingham Drag Strip on May 15, 2009
 - "SIR RICH" from Oklahoma is out of the club
 - "ED" from Ardmore, OK is out bad from the club
 - OUTLAWS LLC dues this year are \$425.00, \$42.50 per region
 - "SKEETER" in CT is out of the club
 - NH Chapter has lost their clubhouse, "HO JO" will now be the point of contact for anyone needing anything in NH
 - "LARRY MAC" is going to CANCUN, MX to talk to people there about opening a chapter

- Savannah, GA clubhouse is being forced to move.
 - “GRIZZ” from Savannah is out of the club
 - “JESSIE” in Alabama was involved in a motorcycle robbery/scam involving another OUTLAWS Member for \$10,000 and is out of the club in bad standing
 - All patches in the COPPER REGION have to go through “LIGHTNING”.
 - There is a new OUTLAWS MC Chapter starting mid-summer in Madison, WS
 - “RABBI” from Wisconsin is out of the club
 - Black Pistons MC is updating their Chapter list and should be available soon.
8. Additional information was also presented concerning runs and events that are scheduled for this summer, as well as listings of OUTLAWS MC Members that are in the hospital or who have recently been involved in motorcycle accidents. A copy of SA Grabman’s (who attended this meeting) handwritten notes, have been placed in the ATF case file.
9. Following this meeting, all the OUTLAWS MC Members listed above who came to the undercover residence, along with SA’s Grabman, Ozbolt and Anderson and the two Confidential Sources (CS’s) went to eat at a local restaurant in Hopewell, Virginia. After eating dinner, while standing outside the restaurant, MARCICIA made statements about having “MAGGOT ALAMODE for desert or better yet MAGGOT LIVER”. MAGGOT is a derogatory term used by the OUTLAWS MC referring to the HELLS ANGELS MC. During this conversation, WERTH stated that he wanted to go down to the area where the HELLS ANGELS MC or their Affiliates might be, send three OUTLAWS MC Members inside see what happens and the rest can come in behind.
10. After eating, WERTH told SA Grabman to find out where the HAMC and/or their Associate clubs would be that evening. SA Grabman told WERTH that he had not been to any of their (HAMC Members and/or associates) bars in the Richmond, Virginia area before. SA Grabman stated that the only bar that he was aware that the HAMC Affiliate clubs, DESPERADOS MC, MERCELESS SOULS MC and the PURE EVIL MC frequent was a bar called the “COCKADES” located in Petersburg, Virginia. SA Grabman further stated that he did not know where it was located. WERTH instructed SA Grabman to find out the exact location of the bar and stated that this was the place that he wanted to go to that evening. SA Grabman attempted to get WERTH to go to an OUTLAWS MC and PMC friendly bar, the Southern Star, but WERTH stated he did not want to go there and again instructed SA Grabman to locate the COCKADE bar. SA Grabman then called PMC PRESIDENT LOVE to find out where the bar is located. LOVE gave SA Grabman a general location of the bar and then put DEVILS GRIP MC PRESIDENT, Chuck BARLOW on the telephone who gave further directions. During this conversation, LOVE told SA Grabman to call him if they ran into any HAMC Affiliate club Members, stating that he and several other PMC Members would be there to help them if needed.
11. While driving to the COCKADE bar, WERTH called SA Grabman, who was in a separate vehicle, and instructed him to find a place for everyone to pull off so he (WERTH) could discuss the plan that he had devised. The undercover agents and CS’s, followed by the OUTLAWS MC Members, pulled into a school parking lot off Highway 36 and parked. Everyone exited their respective vehicles and WERTH then detailed his plan. WERTH stated that he wanted three of the smaller OUTLAWS MC Members, selecting SA Anderson, one of the ATF CS’s and OUTLAWS MC Member DAVEY, to go into the bar first. WERTH then stated that himself, MARCICIA and MCCALL would then go into the bar “slick back”, referring to not wearing their colors. WERTH stated that SA’s Grabman and Ozbolt, along with BEATTY and TIMBERS, would wait outside the bar and watch over Mike SMITH, who would stand outside the bar, in plain site wearing his OUTLAWS patch, to try to lure anyone outside into the bar. SA’s Grabman and Ozbolt, along with BEATTY and TIMBERS, were then to follow SMITH into the bar, approximately 15 minutes after the first group entered the bar. While in the parking lot, WERTH, MARCICIA and MCCALL were observed with firearms, placing them on their person.
12. Everyone then left the parking lot in their respective vehicles and drove directly to the COCKADE bar, located at 305 N. SYCAMORE STREET, PETERSBURG, VIRGINIA. As planned, one of the ATF CS’s, DAVEY and SA Anderson, all wearing their OUTLAWS MC patches, entered the bar first, shortly thereafter followed

by WERTH, MARCICIA and MCCALL, who were not wearing any OUTLAWS MC insignia. Approximately 5-10 minutes later, SMITH walked up, wearing his OUTLAWS MC patch and stood across the street from the bar. Within five minutes, two Members of the DESPERADOS MC walked up along side the bar with two females. As they neared the front of the bar, they motioned for the two females to walk back from the direction from where they had come and were heard telling the females to go back to the car. The two DESPERADOS then walked into the middle of the road and began verbally confronting SMITH. The DESPERADOS were heard yelling at SMITH, stating that Petersburg was “their town” and that the COCKADE was “their bar”. SMITH responded that VIRGINIA is an OUTLAW state, that Petersburg is an OUTLAW town and this is an OUTLAW bar now. After a couple of minutes of this banter, the two DESPERADOS entered the bar. Shortly thereafter followed by SMITH, BEATTY, TIMBERS and SA’s Grabman and Ozbolt, who were all wearing OUTLAWS MC patches. When the two DESPERADOS MC Members entered the bar, they were joined thereafter by a third DESPERADO wearing a DESPERADOS MC patch. Two of the DESPERADOS MC Members walked past SA Anderson, DAVEY and the ATF CS and then continued onto and entered the men’s restroom near the rear of the bar.

13. After a brief time period, the two DESPERADOS MC Members exited the bathroom and as they walked past SMITH and BEATTY, they engaged in a heated conversation with SMITH and BEATTY. During this verbal confrontation, SMITH began physically assaulting one of the Members of the DESPERADOS MC. During this confrontation, the DESPERADOS MC Member attempted to retrieve a large Mag Light from his rear pocket. As he began to remove the flashlight, SA Ozbolt grabbed it from his hand (this flashlight was placed into ATF Evidence as Item #031).
14. As the physical altercation began, SA’s Grabman and Anderson, who were approximately 5-6 feet away from the altercation and who were not participating in the altercation, were assaulted by a DESPERADOS MC Associate, during which this individual struck SA Grabman across the face with a full beer bottle, leaving SA Grabman with a gash on his forehead, which produced a large amount of blood. SA’s Grabman and Anderson, disarmed this individual, utilizing their ATF issued batons and this individual then ran out of the bar.
15. During this assault, the DESPERADOS MC Members exited the bar. SA’s Grabman and Ozbolt also exited the bar a short time later and walked back to the ATF undercover vehicle to attempt to remove the blood that had come from SA Grabman’s facial injury and to attempt to stop the bleeding.
16. Shortly thereafter, SA’s Grabman and Ozbolt exited the vehicle and walked back into the bar. During this assault, and while seated in the vehicle, SA Grabman received several telephone calls from PAGANS MC PRESIDENT Charles LOVE, AKA REBAR, as well as SA Ozbolt received several calls from UNTAMED MC Member “CHEW CHEW”. SA Grabman spoke with LOVE during one of these calls and informed LOVE that the OUTLAWS were at the time engaged in an ongoing assault with the DESPERADOS MC. It was later learned that LOVE, PMC Lynchburg Member “TORCH”, PMC Richmond SGT-at-ARMS JIMBO, DEVILS GRIP MC PRESIDENT Chuck BARLOW and UNTAMED MC Member CHEW CHEW, had showed up at the bar to help participate in the assault of the DESPERADOS MC Members. Further details of their participation are detailed in a separate ATF ROI.
17. SA’s Grabman and Ozbolt re-entered the bar and all the rest of the OUTLAWS MC Members were still in the bar. A short time later, several marked police units from the Petersburg Police Department arrived at the bar. All of the OUTLAWS MC Members, including the undercover agents and the CS exited the bar and walked together around the corner. As they walked they observed numerous Members of the DESPERADOS MC standing in a parking lot. WERTH, MARCICIA and SMITH began walking toward these DESPERADOS MC Members, followed by the rest of the OUTLAWS MC Members, to include the ATF undercover agents and the CS. As they approached the DESPERADOS MC Members, a female was observed passing a handgun through an open window of her vehicle to one of the DESPERADOS MC Members who was next to the vehicle (this is the same DESPERADOS MC Member, believed to be identified as AKA “RAMBO”, the ENFORCER for the PETERSBURG, VIRGINIA DESPERADOS MC CHAPTER. WERTH, who had walked to approximately 15 feet from where the DESPERADOS MC Members were standing, made a statement to the DESPERADOS MC Member who was now holding the handgun at his side, that he (WERTH) knew that the individual had the gun

in his hand, stated words to the effect of “you are a P%er, lets see if you are willing to do what it takes to be a 1%er”. At this point, WERTH pulled back his coat and placed his hand on his pistol, which was now in open view and MARCICIA withdrew his silver colored revolver from the back of his pants, showing it to the DESPERADOS MC Members and then placed it under his arm. During the course of this confrontation, the DESPERADOS MC Member who had assaulted SA Grabman with the beer bottle inside the bar, withdrew a knife and held it at his side in confrontation to SA’s Grabman and Anderson, who had walked to where he was standing in the group. SA Grabman disarmed this individual utilizing his ATF issued baton and the individual then ran from the area. After a short verbal exchange between WERTH and the DESPERADOS MC Members present, local law enforcement marked units began arriving in the area. The OUTLAWS MC Members, to include the undercover agents and the CS, then walked away from the area.

18. Following this incident, it was discovered that DAVEY had been arrested inside the bar by officers from the Petersburg Police Department for possession of brass knuckles and a concealed weapon (knife). DAVEY was allowed to bond out on the misdemeanor violations and later met up with undercover agents. During this time, SA Ozbolt received a telephone call on his undercover phone from CHEW CHEW. When SA Ozbolt answered the telephone, he discovered that it was PMC PRESIDENT LOVE that had utilized CHEW CHEW’s phone to call him. During this discussion, LOVE told SA Ozbolt about how he (LOVE), along with PMC Member TORCH, PMC SGT-at-ARMS JIMBO, DEVILLS GRIP MC PRESIDENT Chuck BARLOW and UNTAMED MC Member CHEW CHEW had come to the COCKCADE bar to help assault members of the DESPERADOS MC with the OUTLAWS. LOVE told SA Ozbolt that they had jumped out of their vehicle with three axe handles and a gun and chased down some of the DESPERADOS MC Members.
19. The OUTLAWS MC Members and the undercover agents and CS, regrouped and then went to Live Wires bar, located in Hopewell, Virginia, during which no additional incidents occurred. During this time, TIMBERS and BEATTY left the bar, stating that they were driving back home.
20. After leaving the Live Wire bar, The OUTLAWS MC Members, along with the undercover agents and the CS drove back to the undercover residence. While driving back to the undercover residence, Mike SMITH, who was riding in the undercover vehicle with SA’s Grabman and Ozbolt, along with DAVEY, stated that “bad part about being in another state is I feel naked without my gun, you know I am a felon, I’m not supposed to have one”. A criminal history check of SMITH’s criminal background shows that he is in fact a convicted felon.
21. Upon returning to the undercover residence, there were brief discussions concerning the evening’s incident. Additionally, WERTH was observed removing the pistol that he carried in a belly band around his waist. SA Ozbolt was allowed by WERTH to look at the pistol, which is described as a silver in color, Ruger P 90 pistol. SMITH and DAVEY did not stay at the undercover residence, but instead returned and utilized the room at the Fairfield Inn, which had been used to conduct the earlier Regional Bosses meeting.
22. The following morning, March 15, 2009, around 9:00am, the OUTLAWS MC Members who had stayed at the undercover residence, WERTH, MARCICIA and MCCALL, left and drove back to North Carolina.
23. Further details of this event are contained on the audio CD recording made from the recording device worn by SA Ozbolt, which has been placed into ATF Evidence as Item #E-089.

Exhibit 13

FRESNO COUNTY BYLAWS & RULES

BYLAWS NO COWARDS

1. You must own or possess a Harley-Davidson motorcycle at all times. Some exception can be made due to finances deemed by charter at that time.
2. No pipes – No hypes – No exceptions.
3. No rats – no informants. You will not send someone to jail or prison due to your testimony or comments given in a statement. No cops – Retired, current or have trained or even considered.
4. No child molesters.
5. No (___).
6. Must have and conduct a weekly meeting. (church)
7. Must be over 21 years of age.
8. There will be **NO** stealing amongst members and prospects.
9. There will be no lying amongst members. (kicked out)
10. Must pay ***Due's***.

VOTES (making it count)

1. Must be a member to Vote.
2. A member must be in good standing in order to have a Vote count.
3. ***ALL*** members will be notified one week before a vote is taken. You must attend the meeting that votes are collected to have a vote count.

4. Your dues must be reasonably current in order for your vote to count. Exceptions - If a member is on parole or in the hospital and (attends), his vote will count. Charter issues only.
5. **IF** your membership is in question your vote will not count on that issue and on that issue alone. (your membership)
6. If your patch is boxed, your vote will not count.

VOTING (the numbers)

1. Vote for hang-around and prospect will be (2/3 majority.)
2. Vote for membership will be (100%). If there is only one ~~no~~ vote it must be explained and accepted by charter.
3. Vote for discharge of membership. (majority)
4. Vote for rules and motions. (2/3'rd majority)
5. Votes for fines and punishment. (majority)
6. Votes for officers will be (motioned first and seconded) and will be motioned one week prior to the charters anniversary. The week of the charter anniversary, votes will be counted. (majority).

TREASURY

1. Dues: members will pay monthly dues of \$100.00. Members will pay weekly dues of \$25.00 but will not exceed \$100.00 for that month or less than \$100.00 for that month.
2. To change dues amount will require a written motion one month prior to vote. It will require 2/3rd's majority to change amount or payment plans.
3. Members 3 months behind on dues will be brought up before charter to have their patch boxed (until paid).
4. Fines from charter will be paid towards "U.S.A. Run" and kept in separate account for, "U.S.A. use only. Vote to use money otherwise. (majority).
5. Fines to be doubled when paid late, unless charter votes to allow more time. Motion to be brought up one month prior to due date. (2/3rds majority to accept or not).
6. Disciplinary fines not mentioned in a rule will be brought up and voted on the next week. (majority)

MAINTAINING MEMBERSHIP

1. Must attend weekly meeting. Missing meeting will be punished with a fine of \$25.00. (prospects - doubled). To have fine levied must be brought up to the membership the next week by offender and voted on. Majority rules. Incarceration or reasonable Health-Issues will be excused.

MAINTAINING MEMBERSHIP

2. Any member missing 3 meetings in a row without the charters approval will be brought up for discharge of membership.
3. Members must ride their Harley-Davidson motorcycle to meetings at least 75% of the time. From March 31st through November 1st.
4. Members must wear their patch to every meeting.
5. Members must keep and maintain a running Harley-Davidson motorcycle. Down time on members motorcycles will be limited to 6 weeks max., during riding season. (March 31st-November 1st). A \$50.00 fine will be imposed after 6-week period is up. Also, \$50.00 will be paid towards the 6-weeks if expired time has lapsed.
6. Members will maintain a current driver's license with a motorcycle endorsement at all times. Fine for suspended drivers license will be \$50.00 per month.
7. Members will maintain current registration on Harley-Davidson motorcycle that is ridden by that member. Fine will be \$50.00 per month not current. This rule applies to insurance as well.
8. Members will not be influenced by narcotics or alcohol during or prior to meetings. You will be kicked out of the meeting and fined \$25.00 and counted as absent for that meeting.
9. A member will not have sexual relations with another member or prospects wife or girlfriend. Punishable by taking membership.

10. Members and prospects will fight one on one. No weapons. Fine \$100.00. If offense is great enough their membership will be brought before the charter for discharge. (2/3rd's majority)
11. Every member and prospect will file for a passport. Prospect will not make member without filing. Member will be fined \$100.00 per year not filed. (excused on eligibility).
12. Officers will ride in front of the motorcycle pack. Members behind Officers, prospects behind members, hang-around behind prospects, friends and others behind hang-around.
13. A member with a conduct problem will be brought up before the charter for Vote of Punishment (2/3rd's majority). That problem must question integrity of our club or charter.
14. A member must make engagements on time. If an engagement time is agreed upon and not met you will be fined \$1.00 per minute you are late.
15. A misconduct punished by a fine must be announced in meeting and reported to Treasurer by offender. Must also announce status of money being paid on the fine.
16. Only members will be present in meetings unless determined otherwise by charter. Guests will be brought up one week prior to attending meetings.
17. Only members will wear our patch. No exceptions.

18. You must maintain membership for over one year before you can transfer. Before transferring you must be in good standing. (dues, fines paid in full). You must also bring up intention of transfer at least one week before leaving charter. We will not except a members transfer into our charter without one year of good membership and a letter of transfer from their charter. Their dues and fines must be paid in full and meet our membership requirements. (2/3r'ds majority vote before entering our charter).
19. You will maintain a current "property list" of club property. Property lists and updates will be twice a year. Due July 1st and December 31st.
20. Club property will not be made without charters knowledge and approval. This includes all club indicia (Shirts, hats, rings, patches etc.)
21. Lost or stolen property will be punishable by \$100.00 fine per article. It will also be reported and announced as soon as possible.
22. Members will make mandatory runs. Missing a mandatory run will result in a **FINE**.

Fine Double after the	South Run - \$	100.00
Charter leaves for RUNS	North Run - \$	100.00
When a member is	U.S.A. - \$	250.00

~~If a member~~ chosen to attend the world run backs out for a reason not accepted by the charter he will be fined \$1000,00
23. A member will conduct himself in an orderly way during meetings. No Disruptions. Fine \$10.00 per offense.

24. New member probation period is 5yrs. The first year he will maintain the clubhouse and other probate duties if there are no prospects or hangarounds at this time. During the 5yr. period the member will attend all club functions and participate in the charter. The front of the new member vest is up to the discretion of the charter.

2300.00
+ 300.00 +

Making Member - \$1,000.00 membership fee. Includes a background check, vest and patch, visiting charters, maintaining clubhouse and make "U.S.A. Run" before being voted in.

Tattoos – A new member will get a club tattoo within a 30 day period. You must be a member for 5yr.s to get a full back tattoo. **Leaving Memberships** – Black out tattoos. (upon reason) Quitting -will have out date, letters of same size.

Quitting – May come back after one year to original charter.(if charter O.K.)

Patch in Box - 1. No vote for 30 days

2. All Hells Angel indicia will not be worn.
3. Your Office Held – forfeited.
4. Discussion of collateral at this time will be brought up if needed.
5. Member will get his act together in 30 days or may be up for re-vote of his membership.
6. Will attend all club functions.
7. Patch in box 30 day minimum!

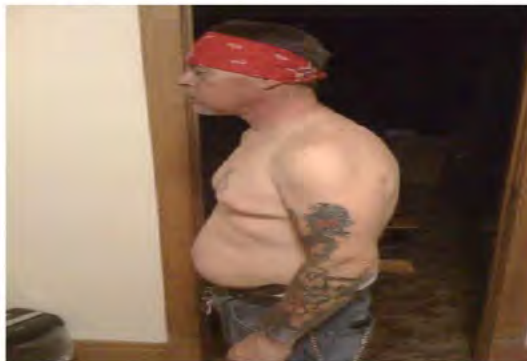
Exhibit 14

New Prospect Form

South Bend ,IN

Charter

Prospect



Name:

Charles Smith

AKA:

Chuck Smith

Address:



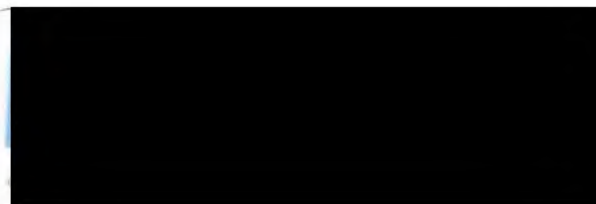
Date In:

4-27-2012

Date Out:

Reason:

Additional Info:



EXPERT-00001388

Exhibit 15

Analysis on how to use Left and Out.

Made by a European Working Group

At the last European meeting, we discussed and agreed on make recommendations to the world concerning how we use **Left** and **Out** today and how to use Left and Out in the future. Due to recent cases, the European representatives also wanted to know if there could/should be other terms used in connection with people leaving our club. Several European countries wanted to present motions concerning this matter, but before they do we should try to analyze the situation on how these terms has been-and should be used in the future. After all, we are talking about something that usually belongs under charter autonomy.

We have two official terms:

Left: The person leaves the club for different personal reasons, or he is told to leave the club or he will be thrown out. This person is okay with the club and can sometimes visit the club etc. The members can talk and socialize with him, as they like. The former member should write Left and the date in an obvious way near his tattoos, give back his Hells Angels paraphernalia and respect the club and its rules after leaving. The charter can change Left to Out, if the person does not respect the club or new information concerning his dismissal turns up.

Out: The person is thrown out of the club and no one wants to see him again. He will have to cover up his tattoos and stay out of sight. Nobody can have any kind of contact with him unless his former charter gives permission, or a majority of his country wants to investigate the matter of his dismissal. It is expected that an Out person will end up with no contact at all, but there can be different reasons and problems which have to be solved, before the final no contact can be imposed.

There is nothing in our rules/traditions that says that all "Out" people should be beat up on sight. That story must originate from old misunderstandings, the police or the media. Most cases of Out differ from one another and therefore Out people will be treated in different ways. Also Out people can be treated different in different countries as long as it fits our rules/traditions.

A charter can revoke an Out decision, make the person to Left, and even bring him back to the club after one year away from the club and one year as a prospect. Also a

charter or a country can change the decision if they find foul play concerning the person's dismissal from the club.

Terms: During the last period, we have seen many different terms used when people are leaving our club and that is part of the reason that we have a problem. We will name them here:

- Left - no contact.
- Left - no contact, and they can never come back.
- Out – no contact.
- Out - bad.

We have described Left and Out and this is what we think about the other terms that are being used.

Left – no contact: This term came up as a kind of uncertain status while the charter was looking into matters that would have influence on their final decision. Some countries want to use this term as a permanent status concerning people who is Left and should not have any contact with other members or charters in the future. The Working Group thinks that we should only have the traditional terms Left and Out. The charter can place restrictions or conditions on his Left status as they wish.

Left – no contact, and they can never come back: This is a term that was somehow invented to a special situation. A charter wanted to make it clear, that this person (persons) can never return to the club. The Working Groups opinion is, that a wording like that means Out.

Out – no contact: This term is fairly new and does not relate to anything we have because Out is always with no contact (look definition above).

Out – bad: The use of the word "bad" makes the Working Group think about when we got rid of the wording "out in bad standing". There is no such term as Out – Bad. When you are Out it is always bad!

Our recommendation:

In the end, it is up to the membership to decide on how to use these terms, but the Working believes that we should continue to have only the two traditional terms Left and Out.

We also think that Left and Out should be defined and written into our World Rules book. To do that we need a motion from a charter.

The European Working Group

EXPERT-00000321

Exhibit 16

BYLAWS WORLD
PROSPECTS & PROSPECT CLUBS

1. Prospects are not allowed to be on official H.A club photos.
2. Prospects are not allowed to attend H.A. meetings.
3. Prospects are prospects for every full member and not only for the chapter or country they are prospecting for.
4. Prospects ride at the rear of the pack on runs.
5. Prospects must prospect for a minimum period of one year.
6. If a prospect is voted in while he is in jail, he receives his colours when he is released on home leave or at the end of his sentence.
7. All prospect-clubs must attend the World Meeting, the fine for missing a World Meeting is \$2000, 00. The fine is appeal able and if the appeal is successful, the fine is cancelled.
8. All prospect clubs must have a stable postal address i.e. P.O. Box # or a clubhouse. Any change must be notified immediately.
9. Every prospect club must visit every country in Europe that has a H.A. chapter, before they can be voted in as full patch.
10. All prospects have to pay 100.00 Swiss francs per year to the European treasury, except if in jail or hospital for a long time.
11. Prospects are not to use anabolic steroids by injection.
12. Prospects have to pay a contribution to the costs of Euro-Runs, even if they do not attend.
13. Prospects are not allowed to send club photos or club patches by mail; they must be handed over personally.
14. All prospects must attend Euro/Worldruns, they are not admitted to the meeting itself but must be in attendance. The details of the location of the meeting will be given out by the local H.A. chapters, or in case of a new country, the Euro-Sec will inform them. 500.00\$ fine is payable for non attendance.
15. Prospects must pay into all treasury and run-funds.
16. All European prospects must speak the English language before they can be voted in as full-member.
17. Prospects can only give presents with death heads on it, after they asked permission to their sponsoring H.A. club.
18. Prospects may not use the words hells angels prospect club on presents or cards.
19. When a hang-around club becomes prospect club they must wear a prospect front patch, a city or country front patch & country bottom rocker with MC patch.
20. Prospects are not to wear any shirts or any other items with the word Hells Angels or HAMC on them.
21. Prospects are not allowed to become drunk or stoned at parties, runs or meetings.
22. Prospects must attend the Euro/World Run on motorcycles in Europe.

EXPERT-00000362

1. If a prospect is voted in while in jail he receives his colours when he is released on home leave or at the end of his sentence
2. If a member is in jail and is dishonourably discharged from the club it is at the charter discretion if the member concerned is thrown out while in jail or on release from jail
3. All charters must attend the world meeting. The fine for missing a world meeting is \$2000 the fine is appeal able and if the appeal is successful the fine is cancelled
4. The vote at world meetings is one man one vote.
5. Charter representatives must be Present in order for there vote to be counted.
6. All charters must have a stable postal address i.e. P.O. Box # or a club house. Any change of postal address must be notified immediately.
7. Any fights between members will be strictly one onto one. No rings are to be worn. No weapons to be used. No kicking when a guy is down. This rule also applies to prospect on prospect and member on prospect. A 100.00 \$fine if rule is broken.
8. There must be 100% in favour from the World Meeting for a hang around club from a new continent to become prospect club.
9. The vote for a prospect club to become full patch also must be 100% of charters
10. Member cards are given only to members.
11. By producing from H.A. posters and H.A. support stickers and support items is a registration print compulsory mandatory
12. When a motion is brought up at the World Run it has to be brought back to the clubs for voting. After that the vote must be send to the Europe- or East-West coast secretary or the country who organize the World Run <within 4 weeks>. Patent funds money U.S.A. must be paid before March every year.20\$ for each member. If this is not paid by a H.A. chapter on time a fine will follow <double payment> In Europe the chapters send money to Herman <Kent>.
13. If a prospect-chapter in a new country becomes H.A. they have to send a fax to - guinea <Oakland> with the request for trademark. Guinea will send that chapter back a confirmation and an official paper <to be filled in> which must be send back to Guinea. After that the new H.A. can arrange the trademark in their own country.

Exhibit 17

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525221	
				Page <u>1</u> of <u>7</u>	
70. Code Section 187 P.C.		71. Crime Murder		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business) V#1: MORRIS, Emerson Richard, AKA "Red Beard"				74. Address 9720 Apple St., Spring Valley	
V#2: SMITH, Raymond Lee, [REDACTED] 'Jingles', [REDACTED] El Cajon				75. Phone	
V#3: MORRIS, Dolores, [REDACTED] Spring Valley					
<p>On 9-5-77 at 1640 hrs., the undersigned was advised by Sgt. KING of the Communications Center that a freeway shooting had occurred north of Escondido on southbound I-15 at El Norte Parkway. The victims appeared to be bikers with one dead at the scene and another transported to Palomar Hospital. Escondido P.D. and the California Highway Patrol had responded to the scene initially and after a determination was made by Escondido P.D. that the site was County, they requested SDSO Homicide Investigators.</p> <p>I arrived at the scene at approximately 1805 hrs., and contacted Sgt. LARSON, SDSO Homicide. LARSON stated that there were four victims of the shooting. One dead at the scene and three injured at Palomar Hospital. Detective F. BALMER, SDSO Homicide, was at the hospital attempting to interview the witnesses. The four victims had been riding on two different motorcycles which were approximately one-quarter mile apart.</p> <p>Other personnel at the scene at this time were:</p> <p style="margin-left: 40px;">Detective D. MC CLURE, Homicide Deputy D. E. PAPP #248 Deputy Coroner M. MURPHY " " Sue BARNETT Lt. BAILEY, S.I.D. Deputy Ban RAMSEY, S.I.D. Criminalist Bill SHARP, S.I.D. CHP Officer CAUGHMAN, Gerald #6264 " " BROWN, Barton #8023</p> <p>The scene of the shooting is the southbound lanes of a six lane interstate freeway which runs north and south on the west end of the City of Escondido.</p> <p>On the dirt shoulder west of the southbound lanes, 15' from the edge of the blacktop and 224' north of the El Norte Parkway exit sign post, I observed the body of a white male adult, face down, partially lying on his right side. The victim was bent forward at the waist with his head pointed in a southerly direction. His left leg was extended and straight in an easterly direction. The right leg was bent at the knee and under his left leg. His left arm was also extended with the hand between his legs at the thighs. His right arm was bent at the elbow with the hand beneath his chest area.</p> <p style="text-align: center;">(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE		Recording Officer [Signature]		Typed By LMO	
Date and Time 10-7-77		Routed By			
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No		Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.		<input type="checkbox"/> C.I.T. <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	
Reviewed By [Signature]				Date 10-7-77	

Form 50.40 DISTRIBUTION: White (Original) & Green to Records Division, Canary, Pink, Golden Rod to Office Files

EXPERT-00001422

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525221	
				Page <u>2</u> of <u>7</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)			74. Addr.	Residence	Business
V#1: MORRIS, Emerson Richard V#2: SMITH, Raymond Lee V#3: MORRIS, Dolores					75. Phone
<p>The victim had been covered by a green cloth sleeping blanket which had been removed from his property on his motorcycle.</p> <p>The victim's face was resting on a folded yellow plastic CHP body blanket. A small fresh pool of blood was visible beneath his face and chest areas.</p> <p>The victim was dressed in blue Levis, brown lace type boots, black leather jacket, and cutoff Levi Mongol colors. A black leather glove was on his left hand. The victim also had a full beard and mustache.</p> <p>Identity of the victim was made through a California Driver's License [REDACTED], Emerson Richard MORRIS.</p> <p>To the left of the victim parked on the shoulder and pointed in a southerly direction was a Harley Davidson motorcycle, maroon in color, California License #3J3274 with '78 tabs. The motorcycle was towing a blue Fiberglass Cycle Kamp camping trailer, California License #NK3388 with '78 tabs. On top of the trailer was a green plastic ice chest, a pair of sunglasses and a green cloth sleeping blanket similar to the one used to cover the victim. Mounted on the trailer fork was a black ammunition can. On top of the can was a black leather glove for the right hand.</p> <p>The motorcycle had two black leather saddle bags mounted on the rear which were locked with small padlocks. Blood stains were noted on the gas tank, engine and frame. The left side view mirror was broken out and a bullet hole was observed in the lower left hand corner. The flanged metal around the hole extended outwards from the chrome frame. A black rubber padding directly behind the license plate had a bullet groove on top from the left rear towards the right front.</p> <p>The undersigned and Deputy Coroner Sue BARNETT then turned the victim on his back for a brief examination. His jacket was unbuttoned which revealed a heavy concentration of fresh blood on his chest. What appeared to be a gunshot entrance wound was noted on his right upper chest and one on the mid left abdomen.</p> <p>The victim's hands and head were then bagged and the body released to the coroner.</p> <p>The entire crime scene was photographed by Deputy Ben RAMSEY of S.I.D. and blood samples taken by criminalist Bill SHARP. In checking the crime scene further, we observed drops of blood located on the pavement of the right hand lane 112' north and another at 200'</p> <p style="text-align: center;">(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE <i>DRP</i>			Recording Officer		Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No			Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.		Typed By LMO Date and Time 10-6-77
			<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other		Reviewed By <i>C.R. Rip</i> Date <i>10-7-77</i>

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525221	
				Page <u>3</u> of <u>7</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business) V#1: MORRIS, Emerson Richard V#2: SMITH, Raymond Lee V#3: MORRIS, Dolores				74. Addr.	75. Phone
				Residence	Business
<p>north from the front end of the Harley Davidson motorcycle. No other drops of blood were located any further north than 200'.</p> <p>At this time Detective MC CLURE interviewed CHP officers CAUGHMAN and BROWN who were the first officers on the scene. Following these interviews, MC CLURE proceeded with the Lab Unit to the location of the other motorcycle, a three-wheel special vehicle, located approximately 1/2 mile south of our location. For complete details of these interviews and second crime scene inspection, refer to his follow-up reports.</p> <p>I was then joined at the crime scene by Detective BALMER who had possible suspect and vehicle description obtained from a hand written statement from witness, John Allen MILLER, DOB: 10-26-55, 1525 Tanglewood Lane, Escondido, 743-7808. The possible suspect vehicle was described as a Buick or Pontiac, 6Q's model, black over gold. This handwritten statement had been given to Escondido P.D. initially by MILLER.</p> <p>This information was subsequently put out on an All Points Bulletin to Stop and Detain. Detective BALMER also obtained other possible witness information from Deputy Coroner Sue BARNETT. For complete details, refer to his follow-up report.</p> <p>At 1845 hrs., on 9-5-77, I contacted the only remaining witness at the scene, William Henry CLOVER, [REDACTED]</p> <p>CLOVER stated that he was southbound on I-15 in the second lane from the right driving his Volkswagen. CLOVER passed the victims because they were traveling slower than he. CLOVER did not observe any other traffic in the southbound lanes. CLOVER heard several loud shots after he passed the victims and thought it was the motorcycle breaking up. CLOVER observed the victims pull over to the side and the male fall off the two-wheel bike. He kept going south on I-15 and decided to go back and check to see what happened. CLOVER remembers seeing a horse and rider on the hill east of the freeway when the first victim fell off his motorcycle. (End of interview).</p> <p>Both motorcycles were then impounded by Allied Gardens Towing, Escondido, (746-6500) and taken directly to the Sheriff's Regional Crime Laboratory. Refer to Deputy PAPP'S vehicle impound report.</p> <p>At approximately 2015 hrs., BALMER and I were advised that San Diego P.D. had effected a stop on a possible suspect vehicle southbound on I-15 at Miramar Naval Air Station,</p> <p>(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE		Recording Officer [Signature]		Typed By LMO	Date and Time 10-6-77
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No		Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.		<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other Reviewed By [Signature] Date 10-7-77	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525221		
			Page <u>4</u> of <u>7</u>		
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business) V#1: MORRIS, Emerson Richard V#2: SMITH, Raymond Lee V#3: MORRIS, Dolores			74. Addr. <input type="checkbox"/> Residence <input type="checkbox"/> Business		75. Phone
<p>and were requesting our assistance. We proceeded to that location and contacted S.D.P.D. Sgt. Dave ELLIOT #359 and Officers W. V. ROBBINS #589 and Daniel KUNKEL #1537. The vehicle was a 1965 Gold Buick, California License #MPG 101.</p> <p>As a result of that stop the following individuals were temporarily detained and transported back to Escondido P.D. for questioning: Larry Dean MULLENIX, [REDACTED], Joseph JASTZEMSKI, [REDACTED], Escondido, [REDACTED], and David Charles EDWARDS, [REDACTED].</p> <p>No connection between these subjects and the shootings could be established and they were subsequently released.</p> <p>At 2400 hrs., on 9-5-77, I contacted Joseph Charles McARDLE, [REDACTED], Escondido, [REDACTED] by telephone after he called our Communications Center.</p> <p>McARDLE stated that he had just watched the late news on Television and became aware of what had actually occurred on the freeway earlier. He had been southbound on I-15 from Lawrence Welk's and first observed the two motorcycles, a two-wheeler pulling a trailer and a three-wheeler, just prior to getting on the new section of I-15 North of Escondido. Approximately 1/2 mile north of El Norte Parkway, he heard two bursts of rapid fire. McARDLE did not observe any vehicles around him but remembers seeing one car between him and the motorcycles. McARDLE could not offer a description of the vehicle between him and the motorcycles. McARDLE observed the motorcycle towing the trailer to pull onto the shoulder of the road and the victim roll off onto the ground. The three-wheel motorcycle was in the second lane to the right. It slowed, swerved to the left and then back to the right. McARDLE continued southbound on I-15 not realizing what had happened.</p> <p>On 9-6-77 at 0845 hrs., I received a telephone call from Franklin William HARDY, DOB: [REDACTED] San Diego, [REDACTED].</p> <p>HARDY stated that on 9-5-77 around 1600 hrs., he was southbound on I-15 north of Escondido driving a motor home. He observed two motorcycles in the right lanes ahead of him when he looked in his rear view mirror and saw a white car southbound in his lane approaching at a fast rate of speed. The vehicle was being driven erratically and at an excessive speed. The white car passed him and he never saw it again. As HARDY approached El Norte Parkway, he saw the motorcycles off to the side of the road and thought it was a traffic accident. HARDY could not offer a description of the white vehicle but stated his ten year</p> <p>(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE <i>DP</i>		Recording Officer		Typed By LMC	
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No		Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.		Date and Time 10-6-77	
<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other		Reviewed By <i>C.R. Ruiz</i>		Routed By Date 10-7-77	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525221	
				Page <u>5</u> of <u>7</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr.		Residence	Business
V#1: MORRIS, Emerson Richard					75. Phone
V#2: SMITH, Raymond Lee					
V#3: MORRIS, Dolores					
<p>old son had observed several people in the car.</p> <p>On 9-6-77 at 1300 hrs., I witnessed the autopsy of Raymond SMITH at the Coroner's Office. The attending pathologist was Dr. KATSUYAMA and Deputy RAMSEY of S.I.D. was the photographer. I viewed the victim lying supine on an examination table with a coroner's surgical incision on the femoral artery on his right leg. A grim reaper tattoo was located on his left upper chest; a motorcycle with the words 'MONGOLS INC. SAN DIEGO' and "CHARAKOA" were tattooed on his left outer bicep. One gunshot entrance wound, 5/16" x 1/2", was located on his left lower chest and another 5/16" x 1/2" entrance wound located on his right upper chest. Above the entrance wound located on the lower left chest was a surgical cutdown performed at Palomar Hospital Emergency Room.</p> <p>Dark discoloration areas were noted behind the victim's right shoulder and inner right bicep. Examination of the chest cavity revealed perforations of the left lung, liver, spleen and colon. Fragmented copper jacketed (with lead) missiles were removed from the victim's right rear bicep behind the right shoulder and from the connecting tissue next to the mid spine on the left side.</p> <p>Trajectory of the shots were from left front towards right rear. The right upper chest entrance wound projectiles were lodged in the upper right arm. The lower left chest entrance wound projectiles were lodged in the victim's internal organs and spinal area. Both projectiles exploded upon impact.</p> <p>Cause of death was given as laceration and hemorrhaging of lung (left), liver, spleen and colon due to gunshot wounds.</p> <p>On 9-6-77 at 1635 hrs., I contacted Steven Noah ROSENLATT of 3145 Lytton Street, San Diego, (222-8961) by telephone. ROSENLATT had previously contacted our Communications Center with possible information.</p> <p>ROSENLATT stated that he and his girlfriend, Odette Jean BURTON, DOB: 10-6-52, 3605 Utah St., San Diego, (291-8389), had been southbound on I-15 the afternoon of 9-5-77 and had followed the motorcycles a long way. Upon reaching the new section of I-15 where the road widens, he was in the left hand lane and the motorcycles were in the right hand lanes. As he passed them he heard what sounded like backfires but then realized the sounds were two rapid bursts of gunfire. ROSENLATT looked to his right and saw a straffing effect on the dirt embankment. He remembers telling his girlfriend that was gunfire and then observed a car swerve in front of him in the left lane at an excessive speed. This car then swerved right</p> <p style="text-align: center;">(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE		Recording Officer		Typed By LMO	
				Date and Time 10-7-77	
				Routed By	
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No		Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.		<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	
				Reviewed By C. R. Ruiz	
				Date 10-7-77	

Form SO-40 DISTRIBUTION: White (Original) & Green to Records Division, Canary, Pink, Golden Rod for Office Files

EXPERT-00001426

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525221	
				Page <u>6</u> of <u>7</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)			74. Addr.	Residence	Business
V#1: MORRIS, Emerson Richard					
V#2: SMITH, Raymond Lee					
V#3: MORRIS, Dolores					
<p>in front of another vehicle almost colliding. The vehicle appeared to be full of people and ROSENELATT observed it to take the Highway 78 offramp towards Oceanside. As ROSENELATT continued southbound the motorcycles faded from view.</p> <p>ROSENELATT described the vehicle as possibly a late 60's model Cadillac, black vinyl roof over gold metallic. The car did not appear to be well kept.</p> <p>Arrangements were made for ROSENELATT and BURTON to come to the Main Office on 9-7-77 at 1200 hrs. to look at automobile identification books. The type vehicle they picked as most closely resembling the car was a 1970 Oldsmobile, Delta 88, 2-door from a 1970 Automobile Index Mug Book.</p> <p>BURTON also added at this time that she remembered the car to have chrome wheels or large hubcaps and that a male in the back seat had long black hair.</p> <p>On 9-7-77 at 1000 hrs., I attended the autopsy of Edward MORRIS aka 'Red Beard' at the Coroner's Office. Dr. KATSUYAMA was the attending pathologist and Deputy Ben RAMSEY was present for photographs.</p> <p>I viewed the victim's body lying supine on an examination table. A coroner's surgical incision was observed on the femoral artery. A tattoo of the word 'MONGOLS' with a motorcycle was visible on the left outer bicep. Below this words 'M.C. SAN DIEGO' were tattooed. Tattooed on the outer right wrist was a peace symbol.</p> <p>Abrasions were noted on the victim's bridge on nose and above the top lip on the left side. Dark discolorations were observed on the victim's lower right abdomen and lower left rib cage area.</p> <p>A 3/8" x 1/2" gunshot entrance wound was located on the lower left abdomen and another 1" x 1 1/2" gunshot entrance wound was located on the top right chest area below the collar bone. Both projectiles exploded upon impact into numerous pieces.</p> <p>Examination of the chest cavity revealed a bruised left lung. Two fragmented projectiles were recovered in the flesh of the lower right abdomen area below the rib cage. Three fragmented projectiles were recovered in the front right shoulder area. Trajectory of the gunshots were at a left front to right rear angle.</p> <p style="text-align: center;">(CONTINUED)</p>					
Reporting Officers D. PORTUGUEZ/HOMICIDE			Recording Officer <i>DRP</i>		Typed By LMO
					Date and Time 10-7-77
					Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No			Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> C11- <input type="checkbox"/> Juvenile <input type="checkbox"/> Patrol <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> Other <input type="checkbox"/> S.O./P.O. <input type="checkbox"/> Other		
			Reviewed By <i>C.R. Ruiz</i>		Date <i>10-7-77</i>

Form SO-40 DISTRIBUTION: White (Original) & Green to Records Division, Canary, Pink, Golden Rod for Office Files

EXPERT-00001427

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525221	
			Page <u>7</u> of <u>7</u>	
70. Code-Section	71. Crime	72. Classification		
73. Victim's Name - Last, First, Middle (Firm if Business) V#1: MORRIS, Emerson Richard V#2: SMITH, Raymond Lee V#3: MORRIS, Dolores		74. Addr.	Residence	Business
		75. Phone		
<p>Cause of death was given as hemorrhaging due to gunshot wounds.</p> <p>On 9-7-77, Detectives T. CARROLL, D. MC CLURE, R. KRAFT and Sgt. C. RING, S.D.S.O Homicide, checked the area of the crime scene again and recovered an expended .223 Cal. cartridge north of the spot where MORRIS expired. For complete details, refer to their follow-up reports.</p> <p>On 9-8-77, at 1020 hrs., I received a telephone call from Sgt. BAILEY of the Narcotics Task Force. BAILEY stated that information received from an informant indicated the slayings were carried out by members of the Hells Angels Motorcycle Gang in retaliation for a dope ripoff involving a new narcotic on the streets referred to as P2P. Additionally, the murder weapon was supposed to have been a M-1 or similar. According to the informant one of the victims should have been a Mongol known as 'HONKY'.</p> <p>On 9-9-77 at 0900 hrs., I was advised by Lt. STANDRING of the El Cajon Police Department that he had a tape recording of an anonymous telephone call regarding the shootings which had been received by his Department on 9-8-77 at 2045 hrs. I met with Lt. STANDRING at El Cajon P.D. at 1030 hrs. and listened to the tape. The caller was a female who stated that a possible incident might occur on Saturday night, 9-10-77, on north Second Street, in El Cajon as possible retaliation. The female would not identify herself and added that the information was third hand. The tape was then retained by the undersigned. The night of 9-10-77 passed without incident.</p> <p>On 9-9-77 at approximately 1600 hrs., a bombing occurred at the Conrad Mortuary in Lemon Grove. This incident was responded to by Detectives T. CARROLL and R. KRAFT, S.D.S.O. Homicide. Due to the fact that the shootings and bombing appeared to be related, CARROLL and KRAFT assumed investigation of Case #525221.</p> <p>For related information on statements given by the victims, refer to Detective F. BALMER'S follow-up report.</p> <p>INVESTIGATION CONTINUING.</p>				

Reporting Officers D. PORTUGUEZ/HOMICIDE		Recording Officer <i>ARP</i>	Typed By LMO	Date and Time 10-7-77	Routed By
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>C.R. Ring</i> Date 10-7-77	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525725
			Page <u>1</u> of <u>9</u>
70. Code Section 12303.3 P.C.	71. Crime Bombing	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business) CONRAD MORTUARY		74. Addr. <input type="checkbox"/> Residence <input checked="" type="checkbox"/> Business 7387 Broadway, Lemon Grove	75. Phone 460-4601

On 9-9-77 at 1530 hrs., I was contacted at my residence by Sgt. KING/Sheriff's Communications Center, and directed to proceed to Conrad's Mortuary, 7387 Broadway, Lemon Grove, to investigate an explosion which caused injury to two persons.

I proceeded to the stated location, arriving at 1650 hrs. Present at the scene were:

Sgt. RING/SDSO Homicide
 Detective CARROLL/SDSO Homicide
 Detective MC CLURE " "
 Representatives of: SDSO & SDPD Intelligence, A.T.F.
 Deputy C. E. GOUGE #565/Lemon Grove Sheriff's Patrol
 Deputy R. E. FIELDS 507/" " "
 Deputy J. BOER #278 " " "
 Deputy W. E. HOGUE #684 " " "
 Sgt. J. LASUER " " "
 Numerous other Supervisors, Deputies, Reserve Deputies and
 Explorer Scouts from the San Diego Sheriff's Office

Shortly after my arrival, Deputy Dave JOHNSON/SDSO Bomb-Arson Detail, arrived and began an investigation into the explosion.

I contacted Sgt. RING and he advised me there were two persons in the Grossmont Hospital Emergency Room being treated for injuries sustained when the explosion occurred. Sgt. RING directed me to Grossmont Hospital to interview the two injured men. Sgt. RING briefed me on the known occurrences prior to, during and after the explosion and I viewed the scene.

I proceeded to Grossmont Hospital Emergency Room, arriving at 1703 hrs., and contacted the nurse who stated the two injured persons were being treated by Dr. R. D. SORNSON, M.D. (Business telephone: 465-0711). I contacted Dr. SORNSON who stated that there were two patients: CANNING, James and LOWERY, William.

The doctor stated CANNING had an injury to the little finger of his left hand which would cause him to lose two-thirds of that finger. He stated CANNING had no other known injuries.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i> 9	Typed By JMR	Date and Time 10-20-77	Routed By
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> C11- <input type="checkbox"/> Juvenile <input type="checkbox"/> Patrol <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> Other <input type="checkbox"/> S.O./P.O. <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> 11/16/77		

NOV 16 1977

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No.
			Page <u>2</u> of <u>9</u>
70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr. <input type="checkbox"/> Residence <input type="checkbox"/> Business	75. Phone

The doctor stated LOWERY had possible internal injuries. The X-ray showed a fracture of the left 10th rib and splenic shadow, indicating a possible injury to the spleen.

When I talked to Dr. SORNSON, both victims were out of the Emergency Room in X-Ray. While waiting in the ER for the return of the victims, I contacted FURZE, Bruce Clark, [REDACTED] (no phone) unemployed.

FURZE stated he is a Mongol Bike Club member and was present at the mortuary when the explosion occurred. FURZE stated he was standing outside the front door of the mortuary when he observed a white male subject, 5-10, medium build, brown hair, curly, "Like an Afro" wearing a "baby blue suit" with white gloves. FURZE stated the man appeared clean shaven. The man walked from the side of the mortuary, casually, around the front of the building, past the front door.

At that time FURZE heard an explosion at the rear of the mortuary and ran in that direction. He did not see the subject in the blue suit again. FURZE stated he did not know the subject and could not identify the subject if he saw him again.

At this point CANNING was returned to the Emergency Room and I terminated the interview with FURZE.

At 1730 hrs., I interviewed CANNING, James (NMN) II, WM, [REDACTED] Santee (residence phone: [REDACTED])

CANNING stated that he and LOWERY had been sitting in CANNING'S truck, later identified as a 1977 Chevrolet pickup, maroon color, VIN: CKL 2472212176, with temp. window sticker. The truck was parked facing a cement block wall in the rear parking lot of the mortuary, a short distance from the vehicle where the explosion took place. CANNING stated he and LOWERY were armed and were acting as guards, during the wake, at the mortuary. CANNING stated he observed a Rambler station wagon, light color, with the side and rear windows painted, drive into the parking lot and park "10 or 20 feet away." The driver of the Rambler left the engine running, exited, closed the front door, opened the rear door, took some flowers out of the rear seat area and carried them to the mortuary rear door. The Rambler driver left the flowers in the mortuary, walked back out to the parking lot, around to the street side and walked along the side of the mortuary until he was out of sight.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i>	Typed By JMR	Date and Time 10-20-77	Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> <i>11/16/77</i>		

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525725	
			Page <u>3</u> of <u>9</u>	
70. Code Section	71. Crime	72. Classification		
73. Victim's Name - Last, First, Middle (Firm if Business) CONRAD MORTUARY		74. Addr.	Residence	Business
		75. Phone		

CANNING stated the only description he could give was that the subject appeared to be tall and was wearing a light blue suit (NFD). CANNING stated the subject had been out of sight for a very short time when an explosion occurred. CANNING stated he and LOWERY exited the truck and prepared themselves for the attack they assumed was forthcoming. They were contacted by Deputy Sheriffs a short time later.

CANNING stated he is not a Mongol, does not own nor ride a motorcycle. He stated he has several close friends in the club and was "helping out."

CANNING stated he is unable to identify the suspect. The interview was terminated.

At 1745 hrs., I interviewed LOWERY, William Van Cleveland, [REDACTED]
El Cajon.

LOWERY stated he and CANNING were sitting in CANNING'S pickup truck parked a short distance from the rear of the mortuary, in the mortuary parking lot, facing a cement block wall. The block wall is parallel to the rear of the mortuary. LOWERY was seated on the passenger side of CANNING'S truck.

LOWERY stated he observed a light colored station wagon drive into the parking lot and stop to the left and rear of the vehicle LOWERY was in. A caucasian male exited the station wagon, obtained some flowers from the rear of the station wagon and walked to the rear of the mortuary. LOWERY stated the flowers were red and white. He stated all of the flowers at the mortuary were black and white.

He stated he assumed the people inside the mortuary would contact the subject and have him change the colors. The subject left the flowers in the rear of the mortuary, walked out of the parking lot to the street and out of sight toward Broadway. A short time later an explosion occurred in the parking lot.

LOWERY stated he exited the truck and stood near the cement block wall in front of the truck. He stated his vision was affected and he was unable to see well. He stated he was shortly contacted by Deputy Sheriffs.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Reporting Officer R. F. Kraft 9	Typed By JMR	Date and Time 10-20-77	Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By [Signature] 11/6/77		

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525725
			Page <u>4</u> of <u>9</u>
70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr.	75. Phone
CONRAD MORTUARY		<input type="checkbox"/> Residence	<input type="checkbox"/> Business

LOWERY described the suspect as: WM, 5-8/5-9, slender, dark wavy shoulder length hair, sideburns and a neatly trimmed goatee; wearing: a blue suit with white gloves (NFD). LOWERY stated he could not identify the subject. The interview was terminated.

I returned to the scene of the explosion and assisted Sgt. RING. The front license plate of the Rambler station wagon was recovered at the scene. A Registration check was made at the Lemon Grove Patrol Station which indicated the Registered owner of the 1962 Rambler was: MIRANDA, Oscar A., 3604 Arruza, San Diego. The phone book gave his phone number as: 423-6899.

I contacted Mr. MIRANDA by phone. He stated he had owned the Rambler but it had developed engine problems. He stated his son, Carlos, had taken the car to a mechanic named ESTOPIER, on Sweetwater Road in National City. The mechanic was told to repair the Rambler and sell it. Mr. MIRANDA stated ESTOPIER did repair and sell the vehicle. Mr. MIRANDA was unable to furnish any information regarding the buyer.

Mr. ESTOPIER was contacted the following day, 9-10-77 by Detectives McCURE and CARROLL. (Refer to their reports.) Mr. ESTOPIER stated he sold the vehicle to a caucasian male but had no information as to who the man was. He stated he had the man fill out a Notice of Sale, the DMV form, but kept no records at his place of business. DMV, Sacramento was contacted and we were advised the person had signed the form with the following information: HENDERSON, Richard, 916 Melrose, or Melrore, Chula Vista. Detective McCURE and myself attempted to contact the residents of the house at that address but there was no response to our knocking. We contacted neighbors who stated a Mexican couple lived at the address. No other street in Chula Vista resembled the street named. Further investigation indicated the person who signed the form had falsified the document. A request was made to DMV to forward a copy of the form to us.

On 9-10-77, 1000 hrs., I received a phone call from FLEURY, Ruth. Ms. FLEURY stated she was the owner of the Flower Barrell, a flower shop at 6931 Federal Boulevard, Lemon Grove. She stated she had heard the news broadcast regarding the bomb explosion.

Arrangements were made for an interview with Ms. FLEURY at the Lemon Grove Patrol Station, at 1300 hrs., 9-12-77. Ms. FLEURY identified herself as: FLEURY, Ruth H., DOB: 10-14-42, residence: 3155 Mt. Acmar Ct., San Diego (279-0319); business address: 6931 Federal Boulevard, Lemon Grove (461-6581).

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i>	Typed By JMR	Date and Time 11-3-77	Routed By
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> Date <i>11/6/77</i>	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. <div style="border: 1px solid black; padding: 2px; text-align: center;">525725</div>		
			Page <u>5</u> of <u>9</u>		
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)			74. Address		75. Phone
CONRAD MORTUARY			<div style="display: flex; justify-content: space-between;"> <div>Residence</div> <div>Business</div> </div>		

At 1250 hrs., 9-10-77, I interviewed an employee of the Flower Barrell. She identified herself as "LAQUE, Monica Louise, [REDACTED], residence: [REDACTED], San Diego ([REDACTED]); business: 6931 Federal Boulevard, Lemon Grove (461-6581). Monica stated she was working the afternoon shift on 9-9-77. At approximately 1430 hrs., 9-9-77, she observed a caucasian male, in his late 30's, 5-10, slender, thin face, lines or acne on face, medium brown hair to below shoulders, brown eyes, wearing a light blue suit, white shirt with open neck.

Monica stated the subject walked around the building for a period of time before entering. After the flowers were ready, the subject put on white, cloth gloves before accepting them. The subject paid for the flowers and left the building. He entered a vehicle, parked next to the business.

The vehicle was described: Late model El Camino or Ranchero style truck, copper-bronze color with a white camper. The vehicle was driven by another person but Monica could not describe him. The interview was terminated.

On 9-12-77 at 1300 hrs., I interviewed Ruth FLEURY. Ms. FLEURY stated she was working at the flower shop during the afternoon of 9-9-77. She stated she first became aware of a male subject walking around the area next to the flower shop. She was waiting on another customer and paid no further attention to the subject until he walked to the door. The subject left the doorway back out into the parking area and returned three or four times, looking in but not entering the flower shop. When the customer completed the transaction and left the shop, Ms. FLEURY walked to the front door and asked the male subject, "May I help you?" The subject stated, "I am waiting." Mrs. FLEURY returned to the interior of the flower shop and continued with her activities.

She observed City buses pass by the shop on Federal Boulevard but noticed that the subject was still standing outside. After a short period of time, the subject came into the shop. The subject stated, "I have to order some funeral flowers and I am kind of in a hurry." Ms. FLEURY asked if the flowers were for a man or woman, and the subject stated, "For a man." She asked if he had any preference as to the type of flowers. The subject stated, "I don't care what it is as long as it is nice." Mrs. FLEURY handed the subject the flower arrangement book and turned the pages to the general area of the funeral arrangements. The subject turned the pages until he had found an arrangement for under \$20. The subject was holding a twenty dollar bill in his hand at the time. He selected red and white carnations.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft 9</i>		Typed By JMR		Date and Time 11-3-77		Routed By	
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No		Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Cii <input type="checkbox"/> Juvenile <input type="checkbox"/> Patrol <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> Other <input type="checkbox"/> S.O./P.O. <input type="checkbox"/> Other		Reviewed By <i>[Signature]</i> Date <i>11/6/77</i>					

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525725
			Page <u>6</u> of <u>9</u>
70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr.	75. Phone
CONRAD MORTUARY		Residence	Business

Ms. FLEURY attempted to have the subject pick a color combination and other details of the arrangement, but the subject stated, "I don't care what you do, I am in a hurry. How long is this going to take?" Ms. FLEURY advised the subject that they had free delivery service and the subject stated, "No, I'll take it myself." Ms. FLEURY stated that she would prepare the arrangement. The subject stated, "How long is it going to take?" Ms. FLEURY advised him 15 to 20 minutes. He asked if she could do it any faster and she stated she would get the arrangement completed as fast as possible.

The subject asked her two or three times during this period what time it was. Ms. FLEURY stated that she observed he was not wearing a watch. Ms. FLEURY stated the actual order for the flowers was made at 1440 hrs. and the subject picked up the flowers between 1500 and 1505 hrs.

After the flower arrangement was completed, Ms. FLEURY looked for the subject around the flower shop, but did not locate him. She returned to the flower shop and in a very short time, observed the subject exit from the passenger side of a vehicle parked next to the shop. The subject entered the flower shop, gave the twenty dollar bill to Ms. FLEURY, she gave him his change, and handed him the flower arrangement. The subject refused to accept the flowers and instead reached in his pocket and withdrew a pair of white nylon gloves. He placed the left glove on his hand and had difficulty with the right. Ms. FLEURY assisted him in getting the right glove on his hand.

It was at this time that Ms. FLEURY noticed the tattoo on the web of his right hand between the thumb and forefinger. The subject accepted the flowers at this time and exited the flower shop without making further comment. He entered the vehicle from which he had previously exited. The vehicle left the parking lot and drove west on Federal Blvd.

Ms. FLEURY described the subject as a white male, 34-35 years, 5-9/5-10, slender, with narrow shoulders and slender waist. The subject was light complected with brown hair, collar length, possibly wavy but brushed out straight. The subject had some gray hair at the temples. The subject had a very neat goatee-style beard--brown with some gray. This subject looked old around the eyes. He was wearing a powder blue sport jacket and powder blue slacks, a long-sleeved white shirt--open at the neck. He was wearing white patent leather loafers. Ms. FLEURY described the subject as appearing to have "Just left a styling salon." She stated he was personally immaculately clean, including hands and fingernails.

The tattoo on his right hand was described by Ms. FLEURY as a four-leaf clover without a stem. The leaves of the clover were merely outlined with blue ink without leaf coloration.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft 9</i>	Typed By JMR	Date and Time 11-4-77	Routed By
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>WJL</i> Date <i>11/6/77</i>	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No.
			525725
			Page <u>7</u> of <u>9</u>
70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr.	75. Phone
CONRAD MORTUARY		Residence	Business

The clover had a red dot in the center. The entire tattoo was approximately the size of a five cent coin. She stated there was nothing distinctive in his speech or mannerisms.

Ms. FLEURY stated the driver of the suspect vehicle was a caucasian male, 25-28, 5-9/5-10, heavier than the first suspect wearing a short-sleeved white shirt--open at the neck, and light slacks--possibly blue. Subject had medium brown hair, bushy, tied in a pony-tail with a light beige nylon scarf.

The vehicle was described as a late model El Camino truck, burgandy color with large tires and Mag wheels on the rear. The vehicle had a cab-high camper shell mounted. The camper shell was white with goldenrod trim. The side windows in the camper shell were green tinted bubble-type windows. The truck and camper were extremely clean and shiny. The license plate was a California blue and yellow plate with the partial license number of: D1011 or D1110.

Ms. FLEURY could give no further information at this time. (Interview terminated.)

On 9-24-77 I received information from an informant that a Hell's Angel, "Terry" and a female, "Pam" had registered in the Hilltop Motel, Highway 78 at Mar Vista, Vista, Room 121, the night before two Mongol bikers, "Jingles" and "Redbeard" were shot in Escondido. The informant stated the information was that "Terry" and "Pam" had come to San Diego to kill "Jingles."

I contacted the manager of the Hilltop Motel on 9-26-77 at 1850 hrs. The managers, BINZER, Horst and Una, produced the registration card for Room 121 for the night of 9/4-5/77. The registration card was signed by Pamela L. DUNN, 1136 Georgia Street, Vallejo, CA. The vehicle was listed as a Ford, California license: WBG 770.

DMV records showed the registered owner as: RUSSELL, Pamela Yvonne, [REDACTED] San Diego. I showed a photo lineup, consisting of six photos, number '4' of which was of HOOK, Pamela Yvonne, [REDACTED] AKA: Pamela DUNN, Pamela RUSSELL, etc. I first showed the lineup to BINZER, Una Denise, [REDACTED] Business & Residence phone: 726-7010, and asked her if she recognized anyone as the female who registered the night of 9-5-77 for Room 121. Una BINZER stated, "If I had to say, I would say, vaguely, Number 4."

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i> 9	Typed By JMR	Date and Time 11-4-77	Routed By	
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> Civil <input type="checkbox"/> Patrol <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> <i>11/6/77</i>		

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No. 525725
			Page <u>8</u> of <u>9</u>
70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr. <input type="checkbox"/> Residence <input type="checkbox"/> Business	75. Phone
CONRAD MORTUARY			

I next contacted BINZER, Horst (nmn) [REDACTED] Vista (726-7010). I asked Horst BINZER the same question and he stated, "It is very vague but I would say number four."

"Terry" was tentatively identified as Terry DALTON, a member of the Hell's Angels motorcycle club.

The space on the registration card, which indicated the number of guests, was marked "2." I asked Una BINZER, who had taken the registration from Pamela DUNN, why she had written the number "two." She stated, "I must have seen someone else in the car to charge for two. This is the rate for two." Una BINZER stated that she could not recall if she had actually seen someone else in the car. (The interview was terminated.)

I contacted Ruth FLEURY on 10-11-77 and requested she submit to hypnosis to attempt to ascertain a license number for the suspect vehicle. She stated she would cooperate and an appointment was made with Bill BARRAS, 2 [REDACTED] for 10-13-77 at 1300 hrs.

Detective CARROLL contacted Diane SMITH, widow of Raymond SMITH, AKA "Jingles" and requested her to submit to hypnosis. Diane SMITH, even though present when her husband was killed, stated she remembered nothing and refused to cooperate with us.

On 10-13-77 at approximately 1330 hrs., Ruth FLEURY was placed in a hypnotic state by Mr. BARRAS and related the same facts as she had related previously in the original interview, with a very few exceptions regarding the vehicle. The revised description:

VEHICLE: Late model Chevrolet El Camino or Ford Ranchero
 Burgundy color with tan interior
 Wood-grain panels on side
 Has cab-high camper shell, white with burgundy trim
 Gray tinted, bubble windows on sides of camper
 Rear window full width of camper, lifts up
 Vehicle has blue and yellow California license plate on rear
 License Number: 1D11170

The license number is registered to MIKITA, Allan Rae and PINCHARD, Susan, [REDACTED] [REDACTED], San Juan Capistrano. The license is registered to a 1976 GMC windowed van, maroon over white, over maroon.

(CONTINUED)

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i>	Typed By JMR	Date and Time 11-4-77	Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> <i>[Signature]</i>		

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT			69. Case No.				
			525725				
			Page <u>9</u> of <u>9</u>				
70. Code Section		71. Crime		72. Classification			
73. Victim's Name - Last, First, Middle (Firm if Business) CONRAD MORTUARY			74. Addr. <table border="1"><tr><td>Residence</td><td>Business</td></tr></table>		Residence	Business	75. Phone
Residence	Business						

Pictures of the van and owner were shown to Ruth FLEURY who stated the vehicle and owner were not the suspect and his vehicle.

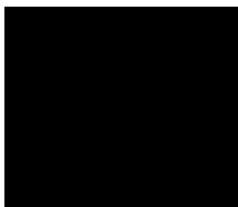
During the investigation we sent information sheets to all Sheriff's Offices in the state, describing the suspect, the tattoo and the vehicle, along with the method of operation. I attended an intelligence meeting at El Toro, during October and presented the information on the shooting and bombing to them.

On 10-3-77, I obtained the original booking sheets from Records, of the known Hell's Angels in the San Diego area. These sheets were signed by the person booked. I delivered these sheets to Sgt. STAYROOK/Sheriff's Regional Crime Lab, for comparison of the signatures to the writing on the DMV form which was signed with the name HENDERSON.

Sgt. STAYROOK examined the documents and stated he could not give a definite answer as to whether one of the persons whose booking sheet was compared, had written the name and address on the DMV form.

He stated the following persons looked the closest:

DITMARS, Larry Leon
PROVAU, Robert Lee
POUTOUS, Henry Leon
SCHULTZ, Douglas Chester
BRIGHT, Robert Lee



INVESTIGATION CONTINUING

Reporting Officers KRAFT/HOMICIDE		Recording Officer <i>R. F. Kraft</i>		Typed By JMR		Date and Time 11-4-77		Routed By	
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To:	<input type="checkbox"/> Detective	<input type="checkbox"/> C11	<div>Reviewed By <i>[Signature]</i> <i>11/6/77</i></div>					
		<input type="checkbox"/> Juvenile	<input type="checkbox"/> Patrol						
		<input type="checkbox"/> Dist. Atty.	<input type="checkbox"/> Other						
		<input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> Other						

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT		69. Case No. 525725
		Page <u>1</u> of <u>5</u>

70. Code Section 12303.3 P.C.	71. Crime Explosive Device	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business) V#1: LOWERY, William V. WM/28 V#2: CANNING II, James (NMN)		74. Addr. <input type="checkbox"/> Residence <input type="checkbox"/> Business	75. Phone

On 9-9-77, at 1527 hrs., the undersigned was notified by Sgt. KING, Communications Center, that a bomb had exploded at the Conrad Mortuary, 7387 Broadway, Lemon Grove. Sgt. KING further stated that the remainder of Homicide Team #4 had been notified, along with Sgt. RING (Homicide) and the Crime Lab.

The undersigned had been previously advised that Conrad Mortuary was handling the burial arrangements for the Mongol Motorcycle Club, i.e. MORRIS, Emerson Richard and SMITH, Raymond Lee. Refer to SDSO #525221.

At approximately 1618 hrs., undersigned arrived at Conrad Mortuary, 7387 Broadway, Lemon Grove. The CHP and Sheriff's Department had secured the area surrounding the mortuary, i.e. West Street was completely blocked between Broadway (North) and Pacific (South).

I immediately contacted Sgt. RING who advise that (2) victims, (LOWERY, William V. and CANNING II, James) were enroute Grossmont Hospital with unknown injuries. Sgt. RING also indicated the primary crime scene was in the rear parking lot (South) of the mortuary. I then observed the remains of an automobile and assorted debris scattered throughout the area. For details of crime scene refer to Detective MC CLURE'S, Deputy NILSON'S and Detective JOHNSON'S report.

WITNESS: Eugene Randall ELDER "RANDY"
 WM/27, [REDACTED]
 [REDACTED] Santee 448-9480

ELDER was interviewed by the undersigned at approximately 1710 hrs. in the parking lot of Conrad Mortuary.

ELDER stated he arrived at the Mortuary at 1300 hrs., 9-9-77, and parked his motorcycle, License #845 965, against the south wall of the parking lot. Several members of the Mongol Motorcycle Club were standing in a group at the rear of the parking lot, i.e. "Big Red" LOWERY, Frenchy PATHA, Honda Bob WINTERS, Awful MAXWELL, to which ELDER spoke briefly before walking inside the Mortuary to view the deceased.

After viewing the deceased, ELDER walked out the front door of the Mortuary and became engaged in a conversation with BRUCE-JUICE and "Stony" John RUSSELL. ELDER stated the three were positioned on the sidewalk almost directly in line with the front door when the bomb exploded.

(CONTINUED)

Reporting Officers T. CARROLL/HOMICIDE		Recording Officer <i>[Signature]</i> #258	Typed By LMO	Date and Time 10-3-77	Routed By
Further Action <input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11- <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	Reviewed By <i>[Signature]</i> Date 10-6-77		

OCT 07 1977

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT		69. Case No. 525725
		Page <u>2</u> of <u>5</u>

70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)		74. Addr.	75. Phone
V#1: LOWERY, William V.		Residence	Business

V#2: CANNING II, James (NMN)

Upon hearing the explosion, ELDER immediately ran around the building towards the rear parking lot but stopped when someone yelled, "The guy in the blue suit." ELDER then ran to the front of the Mortuary, but did not observe the male in the blue suit.

ELDER further stated that while standing in front of the Mortuary, the suspect had passed ELDER, walking East on Broadway. ELDER also stated the suspect walked in a rapid pace with long strides.

ELDER described the suspect as follows:

6-0, 175, Thin build.
 Light brown, wind blown hair.
 Bushy eyebrows, with deep set eyes.
 Light brown beard, neatly trimmed.
 Wearing a light weight dress suit, light blue in color. White shirt open at collar, no tie. White gloves and white deck shoes.

End of interview.

WITNESS: William J. MAXWELL "AWFUL"
 WM, 31, [REDACTED] San Diego 280-2280

MAXWELL was interviewed by the undersigned at approximately 1735 hrs., at the Conrad Mortuary.

MAXWELL related that he arrived at the Mortuary at noon and parked his motorcycle in the southwest portion of the parking lot. MAXWELL had been assigned the duty as security guard by Mongols.

The first person to arrive after MAXWELL was victim, SMITH'S Uncle, who only stayed a short time and then left.

MAXWELL subsequently entered the Mortuary, viewed the decedant and returned to the rear parking lot. MAXWELL then joined a group of people that included Ernie and Lena GOMEZ, Red LOWERY, STONEY RUSSELL, Mr. RUSSELL, and Skip CANNING.

(CONTINUED)

Reporting Officers T. CARROLL/HOMICIDE		Recording Officer <i>CC</i>	Typed By LMO	Date and Time 10-3-77	Routed By
Further Action <input type="checkbox"/> Yes Copies To: <input type="checkbox"/> No		<input type="checkbox"/> Detective <input type="checkbox"/> C11 <input type="checkbox"/> Juvenile <input type="checkbox"/> Patrol <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> Other <input type="checkbox"/> S.O./P.O. <input type="checkbox"/> Other			
		Reviewed By <i>C.R. R...</i>		Date 10-6-77	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525725	
				Page <u>3</u> of <u>5</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)				74. Addr.	75. Phone
V#1: LOWERY, William V. V#2: CANNING II, James (NMN)				Residence Business	
<p>At a point in time, which MAXWELL is uncertain, probably at 1500 hrs., a pink Rambler station wagon, License #MGP 760, drove into the parking lot and parked on the East portion facing the Mortuary garages.</p> <p>MAXWELL believes the suspect left the engine running after he exited the vehicle. The suspect then opened the left rear door and was observed to walk to the rear of the Mortuary carrying a red/white bouquet of flowers.</p> <p>The suspect entered an apartment above the Mortuary and gave the flowers to somebody, immediately left and walked around the corner of the Mortuary towards Broadway. Approximately 20 to 30 seconds later, the suspect's vehicle exploded, at which time MAXWELL ran north towards Broadway yelling, "Get the guy in the blue suit." MAXWELL was unable to catch the suspect.</p> <p>MAXWELL described the suspect as follows:</p> <p>WM, 20-30 years, 5-8 to 5-10, Medium build, 150-170 pounds. Light brown, medium length hair, unkept. Deep set eyes, bushy eyebrows, and a light brown beard.</p> <p>The suspect was wearing a light blue dress suit, white shirt, white cloth dress gloves and white deck shoes. MAXWELL also stated the suspect walked in a carefree style.</p> <p>End of interview.</p> <p>WITNESS: Robert WINTERS "HONDA BOB" WM, 36, [REDACTED] [REDACTED] San Diego 280-2280/461-4797</p> <p>WINTERS was interviewed at 1755 hrs. at Conrad Mortuary by the undersigned.</p> <p>WINTERS related that he drove a black '59 Ford Ranchero, containing Cathy CALDARELLI and her girlfriend, parking northbound on the eastside of West Street, adjacent to the Mortuary parking lot. After exchanging greeting with numerous members of the Mongols, WINTERS entered the Mortuary with the two females.</p> <p>WINTERS further related that sometime after 1435 hrs., while reading the 23rd Psalm, he heard a terrific explosion. WINTERS responded by exiting the Mortuary through a side door</p>					
(CONTINUED)					
Reporting Officers		Recording Officer		Typed By	
T. CARROLL/HOMICIDE		<i>EC</i>		IMO	
Date and Time		Routed By			
10-3-77					
Further Action		Copies To:			
<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.			
		<input type="checkbox"/> C11 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other			
Reviewed By				Date	
<i>C.R. Ruiz</i>				10-6-77	

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT		69. Case No. 525725
		Page <u>4</u> of <u>5</u>

70. Code Section	71. Crime	72. Classification	
73. Victim's Name - Last, First, Middle (Firm If Business)		74. Addr.	75. Phone

V#1: LOWERY, William V.

V#2: CANNING II, James (NMN)

that opens on West Street. Upon exiting the Mortuary, WINTERS heard someone yell, "The guy in the blue suit." WINTERS then ran to the corner of Broadway and West but saw no one, he then ran to his vehicle and subsequently checked the area for the suspect east of the Mortuary. After failing to observe the suspect, WINTERS returned to the Mortuary and waited for the arrival of the ambulance and sheriff deputies.

End of interview.

WITNESS: James. L. RUSSELL

WM/52, [REDACTED]

The undersigned interviewed RUSSELL at Conrad Mortuary at 1845 hrs., date.

RUSSELL stated he arrived at the Mortuary at 1400 hrs. but left and returned on his motorcycle between 1430 hrs. and 1500 hrs. parking in the Mortuary parking adjacent to West Street.

RUSSELL was sitting on his motorcycle talking to Red LOWERY, Skip CANNING and Awful MAXWELL when he observed a pink 1962 Rambler Classic Station wagon drive into the parking lot and park on the eastside of the lot. The suspect turned the motor off, exited the vehicle and then opened the left rear door and remove a bouquet of red and white flowers. The suspect began walking towards the rear of the Mortuary but stopped approximately 15 feet from the Rambler and looked back at the car before proceeding towards the Mortuary. RUSSELL then yelled at "RED" to stop the suspect because he was carrying red and white flowers into the Mortuary. (Red and white are the club colors of the Hells Angels). "RED" said "Don't worry because the people inside would stop him from delivering the flowers."


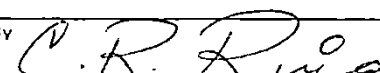
After the suspect left the flowers in the rear apartment, he walked around the left side of the building towards the front of the Mortuary. A few seconds later the Rambler exploded knocking RUSSELL off his motorcycle. RUSSELL was taken to Kaiser Hospital and treated for wounds of the left bicep and released.

RUSSELL described the suspect as follows:

White male, 25-28 years, 5-8, 150-155,
 light brown hair, collar length, a neatly trimmed beard, light brown.
 Wearing a light blue suit, white shirt, white gloves and dark shoes.

(CONTINUED)

Reporting Officers T. CARROLL/HOMICIDE		Recording Officer <i>[Signature]</i>	Typed By LMO	Date and Time 10-3-77	Routed By
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To: <input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C11" <input type="checkbox"/> Patrol <input type="checkbox"/> Other		
Reviewed By <i>C.R. Ring</i>			Date 10-6-77		

SHERIFF'S DEPARTMENT - 3700 SAN DIEGO COUNTY DEPUTY'S REPORT				69. Case No. 525725	
				Page <u>5</u> of <u>5</u>	
70. Code Section		71. Crime		72. Classification	
73. Victim's Name - Last, First, Middle (Firm if Business)			74. Addr.	Residence	Business
V#1: LOWERY, William V.			75. Phone		
<p>V#2: CANNING II, James (NMN)</p> <p>The suspect carried the flowers in his right hand, walked in a nonchalant manner.</p> <p>End of interview.</p> <p>The above witnesses appeared at the Lemon Grove Station later in the evening to compare composites of the suspect. Refer to Deputy RAMSEY'S follow-up report.</p> <p>INVESTIGATION CONTINUING.</p>					
Reporting Officers		Recording Officer		Typed By	Date and Time
T. CARROLL/HOMICIDE				IMO	10-3-77
Further Action	<input type="checkbox"/> Yes <input type="checkbox"/> No	Copies To:	<input type="checkbox"/> Detective <input type="checkbox"/> Juvenile <input type="checkbox"/> Dist. Atty. <input type="checkbox"/> S.O./P.O.	<input type="checkbox"/> C117 <input type="checkbox"/> Patrol <input type="checkbox"/> Other <input type="checkbox"/> Other	
Reviewed By				Date	
				10-6-77	

EXPERT-00001277

- [Home](#)
- [About](#)
- [Contact](#)
- [Archives](#)
- [Copyright and Trademark](#)
- [Buy Books](#)

Subscribe: [Posts](#) | [Comments](#)

The Aging Rebel



[The Aging Rebel](#) The man who dies with the most stories wins.

- [All Posts](#)
- [all stories](#)
- [Cheese Whiz](#)
- [Editorials](#)
- [Features](#)
- [How To](#)
- [News](#)
- [Obituaries](#)
- [Reviews](#)
- [The Rebel Rides](#)
-



Thomas Heath Sentenced

February 4, 2012

[All Posts](#)



The great wheel of tragedy turned again yesterday. A 64-year-old Hells Angel named Thomas Heath was sentenced to prison. It will be his second trip to the penitentiary and although he plans to appeal it is unlikely that he will ever be released.

Heath's biography is Faulknerian. "It's all now you see," the greatest American tragedian wrote in *Intruder in the Dust*. "Yesterday won't be over until tomorrow and tomorrow began ten thousand years ago." Even people who have never read Faulkner know his most famous line: "The past is never dead. It's not even past."

Faulkner was writing about Thomas Heath.

The Frame Up

As a 29-year-old Hells Angels prospect in September, 1977 Heath walked into a motorcycle shop called the Frame-Up at 5015 North Figueroa Street in Highland Park, California with a tire. The shop was owned by two Mongols and Heath left the tire to be repaired. There was a bomb inside. It killed two people when it exploded. One of them was a 22-year-old Mongol named Henry Jimenez. The other was a 15-year-old boy named Raymond Hernandez.

It was one of four attacks by members of the Hells Angels on members of the Mongols that season.



Less than three weeks before the tire bombing the Secretary/Treasurer of the San Diego chapter of the Mongols Motorcycle Club, Emerson "Redbeard" Morris, and a Mongol named Raymond "Jingles" Smith, who was the Sergeant at Arms of the same chapter, were shot off their motorcycles on the Golden State Freeway in San Diego County. Los Angeles and San Diego newspapers called it "The Labor Day Murders." Every member of the San Diego charter of the Hells Angels was eventually arrested as a result of the murders of Morris and Smith.

At the viewing for those two dead men a mourner left a white, 1962 Rambler and a bouquet of red and white carnations behind as he walked away. The car exploded moments later and two Mongols and the father of a Mongol were seriously injured. After the fight between Mongols and Hells Angels in Harrah's casino in April 2002 someone sent red and white flowers to the hospital room of then Mongols President Roger Pinney. The flowers were probably a sour gift from an ATF Agent but whoever sent them clearly intended to remind members of both clubs that the past is "not even the past."

Days after the Frame-Up bombing, a van belonging to the President of the Mongols San Fernando Valley chapter exploded at 6:30 a.m. when the Mongol opened his van door.

Heath who, with George Christie, was one of the two original members of the Ventura charter of the HAMC was convicted of two counts of second degree murder in 1994 as a result of the Frame-Up bombing. And, for killing those two people he was sentenced to seven years in prison.

Domestic Violence

Heath was already locked up at the time. He was sent to prison in 1992 after he was convicted of assault with a deadly weapon and "dissuading a witness by threats" following an ugly, violent argument with his then wife.

The most recent charges against Heath also stem from domestic violence. Heath was living with a woman in Ventura in November 2010. The woman told him to move out and when he refused, as is now the custom in America, she called the police. She said he threatened to kill her and her adult son. Allegedly, Heath specifically threatened to tell his Hells Angels club brothers that the woman was "a rat."





Los Angeles Times

LOG IN



ADVERTISEMENT

Bikers' Trade Shows Ends in Brawl; Man, 38, Killed

FEB. 12, 1989 | 12 AM



FROM A TIMES STAFF WRITER

A trade show sponsored by the Easy Riders motorcycle club and featuring vintage and modern bikes, ended in a brawl in the Queen Mary parking lot Saturday night, with helmeted riot police called in to restore order.

One man was stabbed to death but no one was immediately arrested for his murder, said Long Beach Police Cpl. Paul Sanford.

The dead man was identified as Aristeo Andres Carbajal, 38, of Fontana, said Wendy Kuran, spokesperson for St. Mary Medical Center. He died from a stab wound to his chest, which also hit his heart, she said. No one else was treated for injuries.

The incident began about 7:26 p.m. after an uneventful day, said Rich Kerlin, manager of publicity for the Queen Mary complex. About 200 exhibitors had displayed their motorcycles, helmets, jackets and other paraphernalia to an unexpectedly large crowd of about 3,000, he said, adding that it was the first time either the motorcycle club or the Queen Mary complex had hosted such a convention.



Get Unlimited Digital Access
\$1 for 4 weeks | \$98 for 1 year

ADVERTISEMENT

“It was going smoothly, without a hitch,” Kerlin said, until the fight started. “As far as I can tell, it seemed like a group had an altercation with another group and that’s basically all I know.”

The three-day event began Friday night, but Kerlin said it was “highly unlikely” it would be allowed to resume today.

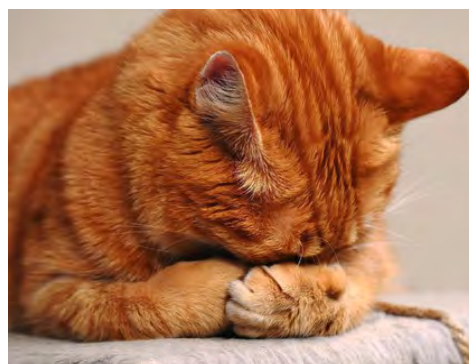
Around the Web

Ads by Revcontent



How Dogs Cry For Help: 3 Warning Signs Your Dogs Is Crying For Help

DR. MARTY



3 Ways Your Cat Asks for Help

DR. MARTY



These Twins Were Named "Most Beautiful in the World," Wait Till You See Them Now

POST EHN



Here's What the Hunger Games Characters Were Supposed to Look Like

RANKER

**Get Unlimited Digital Access
\$1 for 4 weeks | \$98 for 1 year**



By using this site, you agree to our [Privacy Policy](#) and our [Terms of Use](#).

[Login](#) [Watch TV](#)

STORY • Published April 28, 2002 • Last Update January 13, 2015

Motorcycle Clubs Have History of Run-Ins With Law Enforcement

By | [Associated Press](#)

The following is a list of recent incidents involving motorcycle clubs:

- Feb. 23. One man was killed and 10 others injured in a fight between members of the Hells Angels motorcycle club and a rival gang, the Pagans, at the Hellraiser Ball, an indoor motorcycle and tattoo expo in Plainview, N.Y. Authorities said the fight was over turf tensions.
- Oct. 27, 2001. A motorcycle swap meet at the Orange County, Calif., Fairgrounds was canceled after a brawl broke out between members of the Hells Angels, Vagos and Mongols. One man was arrested and four others wounded. Witnesses said gang members fought with gas tanks, shock absorbers and handlebars.
- May 21, 2000. More than 30 alleged members of the Mongols motorcycle gang were arrested and charged with extortion, arson, weapons violations, drug dealing and murder in a nationwide sweep by federal authorities. The arrests followed a two-year federal investigation.
- March 3, 1997. Riverside, Calif., authorities arrest 32 members of the Hells Angels, Hessians, Vagos and Mongols who allegedly worked together to commit insurance fraud. Authorities allege the groups made \$4 million by selling Harley-Davidson motorcycles overseas after filing false police theft reports and insurance claims.



Los Angeles Times

LOG IN



ADVERTISEMENT

Local Biker Slain in Arizona

By HOLLY J. WOLCOTT

JUNE 12, 2002 | 12 AM



TIMES STAFF WRITER

A 25-year-old Hells Angels member from Ventura County was fatally shot in Arizona, and authorities are investigating whether the homicide was linked to an ongoing power struggle between two biker gangs.

Joshua William Harber, a lifelong county resident who worked as a mason and lived in Oak View, was shot once in the cheek about 12:15 a.m. Saturday outside the Coyote Wild Bar & Grill in Cave Creek, police said. He died later that day at John C. Lincoln Hospital in Phoenix.

Harber became a member of the biker gang about six months ago, said George Christie Jr., 54, a co-founder of the Hells Angels' Ventura chapter and a longtime national club spokesman.

"Josh was not an imposing person," Christie said Tuesday. "I don't know why someone would want to shoot him."

ADVERTISEMENT

By continuing to use our site, you agree to [Service](#) and [Privacy Policy](#). You can learn use cookies by reviewing our [Privacy Polic](#)

Organized-crime detectives with the Phoenix Police Department were investigating several motives, including the possibility that the slaying was in retaliation for another recent killing in the gaming town of Laughlin, Nev.

“We are looking at that ... it could be fallout,” Sgt. Lauri Williams said Tuesday.

On April 27, during the 20th annual Laughlin River Run, a fistfight broke out between members of the Hells Angels and the rival Mongols, a Los Angeles-based gang that has long sought a toehold in Arizona. In a shootout at Harrah’s Casino & Hotel in Laughlin, three bikers were killed and at least 12 were injured.

Christie declined to comment on the feud. However, he acknowledged that Phoenix detectives were planning to come to Ventura this week to interview members of the motorcycle club.

ADVERTISEMENT

According to Christie, Harber rode his motorcycle to Arizona with five fellow club members from Ventura. There was no planned event and police believe the group showed up primarily to drink and party.

Police said Harber walked outside the Cave Creek bar and was approached by an unidentified man. The two had a brief conversation before the man shot Harber in the face and fled.

Police would not say whether any physical evidence was found at the scene.

By continuing to use our site, you agree to our [Terms of Service and Privacy Policy](#). You can learn more about how we use cookies by reviewing our [Privacy Policy](#).

Several witnesses at the bar, a known Hells Angels hangout, described the shooter as a white male, about 6 feet 1 and 240 pounds.

ADVERTISEMENT

Sgt. Williams said officers had dealt with relatively few problems with Hells Angels members at the Cave Creek bar. However, she added that cases involving rivalries were difficult because the Mongols had not been wearing their gang colors locally.

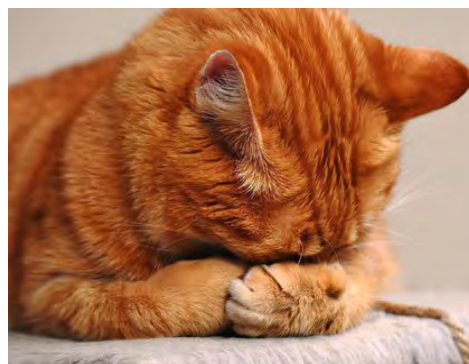
Around the Web

Ads by Revcontent



How Dogs Cry For Help: 3 Warning Signs Your Dogs Is Crying For Help

DR. MARTY



3 Ways Your Cat Asks for Help

DR. MARTY



These Twins Were Named "Most Beautiful in the World," Wait Till You See Them Now

POST FUN



By continuing to use our site, you agree to our [Service and Privacy Policy](#). You can learn more about our [Privacy Policy](#) by reviewing our [Privacy Policy](#).
The Sad Reason Why You Never See Jack Nicholson Anymore
[HTTPS://MATERNITYWEEK.COM](https://maternityweek.com)



A Brawl Between Motorcycle Gangs Turns Fatal at a Nevada Casino

By Alex Kuczynski

April 28, 2002

See the article in its original context from
April 28, 2002, Section 1, Page 22 Buy Reprints

New York Times subscribers* enjoy full access to
TimesMachine—view over 150 years of New
York Times journalism, as it originally appeared.

SUBSCRIBE

*Does not include Crossword-only or
Cooking-only subscribers.

Three men, all motorcycle gang members, were killed and about a dozen others were injured in a shooting and knifing brawl that broke out in Harrah's casino early this morning among rival bikers attending a huge annual motorcycle rally, the authorities said.

Another man, apparently also a biker, was found fatally shot this morning on Interstate 40 just across the border in California, said Sgt. Chris Darcy of the Las Vegas Police Department, which helps patrol Laughlin, a Colorado River gambling resort about 90 miles south of Las Vegas. It was not immediately clear whether his death was related to the casino shootings, the police said.

The police said the fight erupted when a member of the Mongol motorcycle gang walked into a group of Hells Angels near the casino entrance. Sixty to 70 people, armed with guns and knives, were involved, the authorities said.

All three of the dead were bikers, the police said, adding that numerous people were arrested and a handgun was recovered.

Several people at the rally said tensions had been brewing between members of the Hells Angels and the Mongols, and the fight had resulted from a territorial dispute. It was most likely the worst case of casino violence in the history of the state, Sergeant Darcy said.

850

The shooting came on the first night of River Run, the annual motorcycle rally in Laughlin. The rally has been held for 20 years and is considered by its promoters to be the West's largest ride-in motorcycle show, drawing about 50,000 participants a year. It is directed primarily at Harley-Davidson fans, which means it attracts bikers from clubs around the country, who come to gape at new models and to ride up and down the strip.

Until late yesterday afternoon, about a hundred gang members were still sequestered inside the Harrah's casino, being questioned by the police.

"It's very difficult to track everything down," Sergeant Darcy said. "It's not as if this was one person shooting one other person. There were many, many people involved."

Outside, the main strip was humming with thousands of bikers undeterred by this morning's violence and gunning their Harley-Davidson hogs as they rode slowly past the site of the melee. Only a few stopped to crane their necks past the yellow police tape.

Across the street, bikers sat under the temporary awnings rigged off their campers and RV's, as billboard-size banners for Jim Beam and Coors fluttered behind them and the music of Lynyrd Skynyrd and Rush providing a tinny sound track that could only occasionally be heard over the desert wind.

The sign at the main entrance to town was still flashing a warning not to bring bottles or cans onto Laughlin Civic Drive. Also at the entrance was a notice that anyone younger than 16 was under curfew from 6 p.m. to 6 a.m. The neon sign at Harrah's was still flashing the happy phrase: "Welcome Bikers / 25 cent craps."

The highways into and out of the town were closed after the brawl, which began around 2:15 this morning.

Denise Massey, 48, was gambling with her fiancé on the first floor of Harrah's when she noticed 20 to 30 bikers suddenly converge.

"Next thing you know you just hear 'Bam, bam, bam,' " Ms. Massey told The Associated Press. "All of a sudden they're running and just shooting at each other."

According to the federal Bureau of Alcohol, Tobacco and Firearms, the Mongols are one of the most violent and criminally active motorcycle gangs in Southern California. Two years ago, the authorities arrested 29 Mongols on racketeering and other charges in Oklahoma, Georgia and California after an undercover operation in which an A.T.F. special agent infiltrated the club. During the investigation, the authorities recovered more than 70 firearms, including two machine guns.

Seven people injured in this morning's violence were sent to the Western Arizona Regional Medical Center across the river in Bullhead City, Ariz. University Medical Center in Las Vegas was treating five patients.

BREAKING NEWS

Sick San Quentin prisoners could be sent to Bay Area medical center, Newsom says

News

Anti-violence Los Banos rally gets ugly when prayer turns to fighting

By **LESLIE ALBRECHT** | McClatchy Tribune

July 1, 2008 at 12:18 a.m.

LOS BANOS – An anti-violence rally meant to lead attendees into the healing arms of Jesus took a dramatically different path, ending with a clash between rival motorcycle gangs that sent one man to the hospital with stab wounds.

The fight broke out about 3 p.m. Saturday at Los Banos Park on Pacheco Boulevard between members of the Hells Angels and Mongols motorcycle gangs, Los Banos Police Cmdr. Dan Fitchie said.

After the melee, the stabbing victim was flown by helicopter to Memorial Medical Center in Modesto. He was treated and released. Police arrested one man on suspicion of possession of a dangerous weapon – a whip with a metal handle.

The fight is putting local law enforcement on high alert as Los Banos gears up to host a biker rally the weekend of July 12. A second rally is planned for the same

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

The event drew about 500 people, said organizer Pastor Chris Castaneda. Bands played Christian rap, vendors sold steak sandwiches, a car show displayed vintage El Caminos. Mayor Tommy Jones attended. Event organizers presented him with a certificate of appreciation.

At 3 p.m. about 10 members of the Mongols rolled up to the far side of the park near Highway 152, Castaneda said. He and members of Victory Outreach's motorcycle ministry, Swords Afire, greeted the bikers. Castaneda explained the event's peaceful mission and invited the Mongols to stay and eat some food.

A few minutes later, the rumble of Harley-Davidson exhaust pipes filled the air as about seven or eight Hells Angels cruised into the area.

"When I saw them pulling into the park, my gut told me it wasn't going to end very well," Castaneda said.

Accounts of how the fight started differ. According to Castaneda, the Hells Angels headed directly for the Mongols and started shouting at them.

Another witness, who did not want his name used in the newspaper, said Mongols provoked the fight by "flipping off" the Hells Angels and throwing a helmet at them. Other witnesses said the dispute started after Hells Angels saw Mongols posing for a group photo.

Castaneda said he tried to stop the verbal argument from escalating.

"I said, 'Guys, it doesn't have to come to this, that's not what this day is about,' " said Castaneda. "It kind of fell on deaf ears. Before I knew it, me and my guys are in the midst of the brawl."

The fight happened not far from a bounce house where children were playing. After a few moments of fighting, six gun shots rang out, sending the crowd running in all directions, said Castaneda.

Los Banos police, the Merced County Sheriff's Department, the Merced County Gang Task Force and the California Highway Patrol responded to the scene.

Investigators looking for participants in the fight fanned out around Los Banos. One officer spotted motorcycles parked outside a B Street house that authorities believe is the home of a high-ranking member of the Hells Angels' Merced chapter.

That's where officers found the stabbing victim standing in the front yard

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

#: 854

prospect

becomin

d ammon

1. 6. 3.

at the fig

60 WIDE OF

se was al

icle. Atwa

then tran

The two gangs tangled recently at the Los Banos Spring Fair when a Hells Angels prospect member attacked a Mongol, said Roseman.

To prevent further violence during the biker gathering on the weekend of July 12, Los Banos officials say they'll coordinate with other law enforcement agencies including the Merced County SWAT team. "We will be at a very heightened state of preparedness and awareness," said Fitchie.

[Report an error](#)

[Policies and Standards](#)

[Contact Us](#)



The Trust Project



SPONSORED CONTENT

Celebrities Who Strongly Support The Republican Party

By **POLLHYPE**
(FOR RALPH ABRAHAM AND RALPH ABRAHAM)



Leslie Albrecht

SUBSCRIBE TODAY!

ALL ACCESS DIGITAL OFFER FOR JUST 99 CENTS!

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

California biker gets life term for murder of Hells Angels leader

By **Emmett Berg**

MAY 16, 2012

SAN FRANCISCO (Reuters) - A member of the Mongols motorcycle gang was sentenced to life in federal prison without parole on Wednesday for the slaying four years ago of the San Francisco chapter president of the rival bikers group Hells Angels.

Christopher Bryan Ablett, who went by the gang name "Stoney," was convicted earlier this year of murder and other offenses in the 2008 stabbing-shooting death of Mark "Papa" Guardado outside a bar in San Francisco's Mission District.

According to trial testimony, a fight broke out between the two men when Guardado confronted Ablett for wearing his Mongols insignia in the Mission, a short distance from the Hells Angels' San Francisco headquarters.

Ablett stabbed Guardado four times with a foot-long military knife and shot him twice with a .357-magnum revolver, according to a statement from the U.S. Attorney's Office in San Francisco. Local media reports said Guardado was 46 when he died.

Ablett claimed he acted in self-defense. But prosecutors contended that the rank-and-file member of the Mongols, who was visiting San Francisco from Modesto, killed Guardado to raise his status within his own gang.

The Mongols and the better-known Hells Angels, both identified by federal authorities as outlaw motorcycle gangs, have been at odds for decades, often clashing violently.

The FBI cited phone records during the trial showing that Ablett spent several hours after the slaying calling individuals identified as fellow Mongols.

The jury ultimately found Ablett guilty of murder in aid of racketeering, assault with a deadly weapon in aid of racketeering, use of a firearm during a crime of violence, and use of a firearm causing murder.

He was sentenced in federal court to two concurrent life sentences and a consecutive life sentence. Federal life terms do not allow for parole, the U.S. Attorney's Office said.

ng by Cynthia Johnston and Lisa Shumaker)

Support Quality Journalism
Subscribe for only 99¢

START NOW >

Hells Angel pleads guilty in wedding chapel brawl



The drive-up window of the wedding chapel where the brawl occurred in 2008 between rival biker gangs is shown in this 2006 file photo.

By FRANCIS MCCABE LAS VEGAS REVIEW-JOURNAL



July 17, 2013 - 7:10 pm

Don't miss the big stories. Like us on Facebook.

Like 266K

A member of the infamous Hells Angel's motorcycle club on Wednesday pleaded guilty to stabbing and beating rival gang members at a downtown wedding chapel in 2008.

Jeffrey Murray said he was guilty of battery with substantial bodily harm with the intent to promote, further or assist the activities of a criminal gang and coercion with force, both felonies.

As part of a deal, prosecutors agreed to drop 11 other charges against Murray.

The plea bargain was significant for two reasons.

Murray was one of three defendants accused of stabbing Mongols during the brawl at A Special Memory Wedding Chapel on Dec. 20, 2008.

It is also the first case in Nevada where a Hells Angel agreed to a plea deal that included a “gang enhancement.” The gang enhancement will add years to Murray’s prison sentence. Murray was a member of the Hells Angel’s at the time of the brawl, but his current status with the club was unclear Wednesday.

In all, 13 men were charged with bludgeoning three Mongols in the wedding chapel melee.

Eight, including Murray, were to stand trial for the second time on Aug. 5. The first case ended in a mistrial when a judge said prosecutors failed to tell defense lawyers that a detective in the case testified in a child custody hearing for one of the victims.

He will be sentenced by District Judge Ken Cory at an Oct. 17 hearing.

He faces 2 to 16 years in prison. Murray remained free on \$100,000 bond.

His lawyer, Frank Cremen, did not immediately return a call requesting comment late Wednesday.

Chief deputy district attorneys Sonja Jimenez and Marc DiGiacomo are prosecuting the case.

The seven defendants awaiting trial next month are Dominic Orlando, Frederick O’Dell, Brandon Young, James Sexey, John Dawson, John Merchant and Armando Porras. They face about a dozen felony and misdemeanor counts, including attempted murder, battery and conspiracy.

Authorities allege Sexey and Merchant also stabbed victims during the brawl.

The five remaining defendants in the case will face similar charges in two separate trials.

Surveillance footage of the brawl shows Hells Angels and others swarming rival gang members at A Special Memory Wedding Chapel on Fourth Street and Gass Avenue. Six were injured, including three members of the Mongols.

Hells Angels were attending a wedding ceremony. As they were leaving, at least three Mongols were at the chapel for another wedding. The 13 men attacked the Mongols, bludgeoning them with their fists, feet, bottles and trash cans.

Prosecutors called it an unprovoked attack.

The defense lawyers said their clients were acting in self-defense because Mongols had months earlier attacked and killed a Hells Angel in San Francisco.

Contact reporter Francis McCabe at fmccabe@reviewjournal.com or 702-380-1039.

https://www.theeastsiderla.com/news/crime/police-arrest-alleged-mongols-biker-gang-member-in-echo-park-nightclub-shooting/article_3bfda8cb-e6bc-5799-9c6f-eb8b8eda79a1.html

Police arrest alleged Mongols biker gang member in Echo Park nightclub shooting *

The Eastsider
Jul 14, 2010



An alleged member of the Mongols biker gang was arrested this morning in connection with the June 21 shooting outside The Echo nightclub that left three people injured. Police believe the suspect – Jose Luis Sanchez, 25, of Los Angeles – intended to shoot a member of the rival Hell’s Angels motorcycle gang who was inside the Sunset Boulevard nightspot, said Lt. Wes Buhrmester with the LAPD Rampart Division. None of the three shooting victims, however, were associated with either the suspected shooter or the member of the Hell’s Angels, police said.

infolinks

Sanchez arrested without incident in the Hollebeck Division – which includes Boyle Heights, El Sereno, Lincoln Heights and Montecito Heights – after police obtained a search and arrest warrant, Buhrmester said. “Evidence consistent with that at the crime scene was found, as well as numerous firearms,” he said.

Early witness and police reports said the gunman – who was said to have been wearing a black helmet, clothing and boots – fired 8 to 10 rounds from a semi-automatic pistol into the crowd leaving the Sunset Boulevard nightclub at about 2:10 AM. There were some reports that the gunman fired while sitting on a motorcycle but police later said they were still trying to confirm details of the shooting.

Buhrmester noted that The Echo – a popular music venue featuring indie bands – is not known as a biker gang hangout. It’s not clear why a member of the Hell’s Angels was at the club but someone was able to inform Sanchez that a gang rival was at The Echo that night, Buhrmester said.

Update: The post has been updated with with new information about the suspect.

Hells Angels members sentenced in August stabbing

SHARE THIS

https://rapidcityjournal.com/news/local/communities/sturgis/hells-angels-members-sentenced-in-august-stabbing/article_ca6cafbc-66f4-11e1-b3e4-0019bb2963f4.html

Hells Angels members sentenced in August stabbing

Amanda Friar MCTT staff

Mar 5, 2012

SALE! Subscribe for \$1/mo.

Two Hells Angels Motorcycle Club members involved in a stabbing during the 2011 motorcycle rally were sentenced in court in Sturgis on Monday.

Mark Duclos, 48, of Fairbanks, Ala. was sentenced to six years in the state penitentiary, with four years suspended. He was given credit for the 40 days he has served in jail already. He will be required to pay \$2,000 in fines and \$2,146.05 in restitution. Duclos was charged with one count of aggravated assault.

George Caruso, 58, of Shirley, Mass., who was charged with one count of simple assault, was sentenced to 360 days in the Meade County Jail. He will also be required to pay \$2,000 in fines and \$2,146.05 in restitution.

The pair were involved in a fight between the Hells Angels and the Mongols motorcycle club on Aug. 10, which resulted in a stabbing, sending a Mongols member and a Hells Angels member to the hospital with non-life threatening injuries.

Character letters for each club member were sent to the state's attorney's office from family and friends supporting both Caruso and Duclos.

According to Meade County State's Attorney Kevin Krull, the letters sent paint a positive picture of Duclos, though he felt that made the crimes committed worse. **Hells Angels members sentenced in August stabbing** SHARE THIS

"All of the letters makes it appear that he has a positive life back home and it appears he feels like he can behave like a criminal in Sturgis," Krull said. According to Krull, Duclos' behavior since the incident has been inconsistent, sometimes appearing a wheelchair and other times appearing to be able to walk.

Duclos' attorney Angela Colbath out of Rapid City said he has always been consistent and that there was not so much as a traffic ticket listed on his record, so he should be given a shorter sentence.

"He understands that he needs to be mindful of the positions he puts himself into in the future," Colbath said. "I believe that the character letters paint an accurate picture of who Mr. Duclos is."

Duclos apologized for his actions in court, saying he was sorry that the situation arose of such magnitude.

A video of the fight that occurred on Aug. 10 showed that Caruso started the fight, throwing the first punch, which Fourth Circuit Judge Jerome A. Eckrich said was the reason they were there.

Hells Angels members sentenced in August stabbing

SHARE THIS

“You started this with the sucker punch and we wouldn’t be here if it weren’t for you throwing the first sucker punch,” Eckrich said. “I would not have just sent Mr. Duclos off to jail if it weren’t for you. You’re much more culpable than Mr. Duclos.”

According to Deputy State’s Attorney Kasey Sorensen, Caruso has not acknowledged the fact that the incident took place or that he was involved.

“The only thing that he is remorseful about is that he got caught,” Sorensen said. According to Sorensen, the Mongols Motorcycle Club approached the Hells Angels to pay their respects and shake their hands, when Caruso threw the first punch, while wearing black gloves. “It was the middle of August. There was only one reason why Mr. Caruso would be wearing those gloves.”

865

Colbath asked that the court consider the letters submitted to the court from family, friends and business partners on Caruso's behalf.

Hells Angels members sentenced in August stabbing

SHARE THIS

Be the first to know

Get local news delivered to your inbox!

Email Address

Sign up!

* I understand and agree that registration on or use of this site constitutes agreement to its user agreement and [privacy policy](#).

Most Popular

Sturgis City Council urged to hold annual motorcycle rally

Jun 8, 2020



NEWS > CRIME + PUBLIC SAFETY

TEMECULA: No arrests in bloody biker brawl on I-15

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)



A Mongols Motorcycle Club vest is displayed during a 2008 news conference in Los Angeles.

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

Two weeks after a bloody brawl among motorcycle riders on the freeway near Temecula left two Hells Angels with stab wounds, no arrests have been made and investigators say the stabbing victims aren't talking.

The fight blocked northbound traffic on Interstate 15 near the U.S. Border Patrol checkpoint about 6 p.m. March 22, and reportedly involved dozens of bikers described by witnesses as Mongols and Hells Angels armed with weapons such as bats and shovels.

By the time officers arrived, the bikers were gone but they found a bloody fight scene and a discarded knife, a Riverside County sheriff's investigator wrote in search warrant documents. Officers drove north to the Temecula Parkway off-ramp, where they found two motorcyclists.

One of them was wearing Hells Angels clothing and was covered in blood, court records say.

While officers were trying to detain the bikers, a man in an SUV pulled up and identified himself as a Hells Angels chapter president and a friend of the two motorcyclists, Investigator Carlos Topete wrote in court papers. The man collected the injured biker's bloody Hells Angels vest and some other items, putting them in his SUV, Topete wrote.

The injured rider was taken to a hospital for treatment of eight stab wounds.

While officers were investigating, they learned that another Hells Angel with stab wounds had been taken to Rancho Springs Medical Center in Murrieta. The person who dropped him off was driving a truck with Arizona plates and hauling a utility trailer.

The man, who claimed to be the chapter president, later told investigators that the truck belongs to the Hells Angels Motorcycle Club and is used to transport Hells Angels merchandise.

Sheriff's investigators confiscated the Hells Angels vehicles for evidence.

Sgt. Kevin McDonald said investigators believe the purported chapter president misrepresented his position with the group and that he is merely an associate.

Γ_{H} , ! +! 1_ 11_ -1 !11 -1 TT 11 A 1 1_ 1_ 1_ 1 -1 L 11.

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

According to a witness, the conflict between the motorcycle clubs appeared to have started farther south on Interstate 15 in San Diego County.

The witness, a Temecula resident who asked that his name be withheld out of fear for his safety, said he entered the freeway at Highway 76 and noticed a few bikers who appeared to be chasing two Mongols on motorcycles. The Mongols were outnumbered at first, he said, but as they passed Rainbow Valley Boulevard, they were joined by a large group that had been parked off the freeway.

As they passed the checkpoint, dozens of bikers in Mongols clothing surrounded the other bikers, blocking the lanes of traffic. The witness said the men in Mongols Motorcycle Club gear kicked the other men off their bikes. The men pulled out weapons — he saw a hammer, a screwdriver and a crowbar — and began brawling, moving toward the freeway shoulder as they fought, the witness said.

At one point, a pickup hauling a trailer pulled up. The men in the trailer appeared to be holding handguns, he said.

The witness said he called 911 but didn't stick around long enough to see the stabbings.

"My wife was scared," he said. "She just wanted us to get out of there. They were still fighting when we left."

The witness said he couldn't believe they were openly brawling on the freeway in broad daylight.

Capt. Jeff Kubel, who serves as Temecula police chief and commander of the sheriff's Southwest Station, said there's no reason to expect further violence from outlaw motorcycle clubs in the Temecula area. Though it's still unclear what happened, all indications are that the motorcyclists involved were on their way home from events in San Diego County, he said.

Albert Perez, an attorney who represents the Mongols Motorcycle Club, declined to comment Monday.

Efforts to reach a representative of the Hells Angels Motorcycle Club were unsuccessful.

Contact Sarah Burge at 951-368-9694 or sburge@pe.com

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

VALLEY NEWS ([HTTPS://WWW.PHOENIXMAG.COM/CATEGORY/PEOPLE/VALLEY-NEWS/](https://www.phoenixmag.com/category/people/valley-news/))

Death in the Brotherhood

JIMMY MAGAHERN ([HTTPS://WWW.PHOENIXMAG.COM/AUTHOR/JMAGAHEARN/](https://www.phoenixmag.com/author/jmagahearn/)) | July 1, 2015

u=ht

sta

ur



Who killed Cave Creek Hells Angel Patrick Eberhardt? There are some striking theories on the street.

If you want to understand outlaw-biker culture, forget binge-watching *Sons of Anarchy*. Just watch the 7-minute video of the funeral procession for second-generation Hells Angel Patrick Eberhardt, son of the motorcycle club's Cave Creek chapter president, "Spa Bob" Eberhardt. Just a month after celebrating his 23rd birthday, the younger Eberhardt was shot dead on the streets of North Phoenix by a still-at-large assailant on a Saturday night last February.

The video captures hundreds of motorcycle riders, many wearing the HA's trademarked death-head patch and red-and-white colors, riding in a slow, stately procession up Grand Avenue to the strains of Metallica's "Nothing Else Matters." The take-away: Motorcycle clubs, also known as MCs, are intensely disciplined and loyal. They're also impenetrable, talking to media little and law enforcement less.

Which perhaps explains why *The Last Ride of Patrick Eberhardt* is about all you'll find on the Internet regarding Eberhardt's shooting, despite its obvious newsworthiness. As the recent biker shootout in Waco, Texas conclusively demonstrates, feuds between outlaw-biker MCs have a way of escalating into blood baths – a not-outlandish possibility in the Valley, given previously-undisclosed details about the Eberhardt shooting uncovered by *PHOENIX* magazine.

According to a confidential source with close ties to the Arizona Hells Angels, Eberhardt's killers were members of a rival MC. "[The Angels] know exactly how it happened and exactly who did it," the source says, quoting two "full-patch" HA members.

The version of the shooting offered by the source is largely corroborated by a Phoenix Police report obtained by *PHOENIX* magazine. According to the report, an officer arrived at the scene near 15th Street and Bell Road to find two men on the ground: Eberhardt, wearing his HA colors, who was pronounced dead on the scene from two gunshots to his left side; and Stephen Calloway,

Case 1:20-cr-00078-MSC Document 208-4 Filed 10/29/20 Page 21 of 35
a “hang-around,” or a potential prospect of the club, who was treated at a nearby hospital. Police interviewed four other bikers at the scene, who were all identified as members of California chapters of the Hells Angels, but none of them claimed any knowledge of what happened.

The report notes that earlier in the day there had been a shooting near 30th Street and Thomas Road in which unidentified bikers – possibly Hells Angels, though that detail is not spelled out in the report – fired shots at members of the Mongols, a longtime HA rival club with chapters in Phoenix and Mesa, and that one of the two unnamed suspects in the ongoing investigation into Eberhardt’s death is a Mongol member. According to the report, there was some “traffic-related” contact between the Hells Angels and the suspects riding in a car along Bell Road shortly before the shots were fired.

The shooting has likely placed the Arizona Hells Angels at a philosophical crossroads. Within the outlaw-biker community, Arizona is known as Hells Angels territory, and the club has gone to war with interlopers in the past – most recently in 2010, when members of the Hells Angels Skull Valley chapter and a rival club called the Vagos traded nonlethal gunfire near Prescott. But retaliation carries a price, as the 170 indictments handed down in the wake of the Waco shooting – which resulted in nine deaths – demonstrate.

It’s relevant to note that one of the clubs involved in the Texas melee, the Cossacks, are HA-affiliated – and were allegedly making a push for territory prior to the shootout.

Phoenix Police declined to comment on the Eberhardt murder investigation, and the lack of an arrest has left some observers feeling dubious about a legal resolution. “This murder will never be solved,” says Donald Charles Davis, L.A.-based author of *Out Bad* – which depicts the battles between the Mongols and law enforcement – as well as the popular biker blog *The Aging Rebel*. “Unless they have an undercover ATF agent patched inside the Mongols or prospecting the Hells Angels – which, to the best of my knowledge, they don’t – I just don’t think anybody’s going to talk on this.”

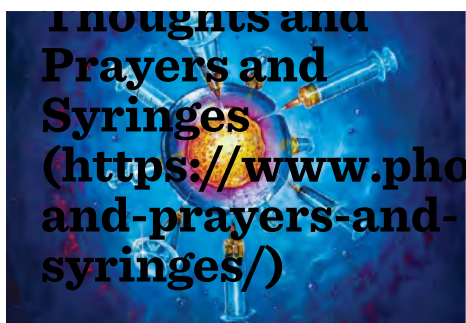
Davis has another theory as to why the investigation may be languishing – a theory that jibes neatly with the outlaw-biker world’s institutional paranoia of all things law enforcement. After posting a brief story on his blog about Eberhardt’s murder, an anonymous reader left the comment “Payback is a bitch,” which Davis believes was meant to bait rival clubs into a turf war. Davis tracked the source of the post to a private server in Frankfurt, Germany that he says was used in the past by ATF agents as a “honeypot” to lure Al-Qaeda militants. Davis has a hunch the shots may have actually been fired by members of the Iron Order Motorcycle Club, a “law-abiding” club composed largely of off-duty cops and military officers with three Phoenix chapters who would have access to government assets like the Frankfurt server.

“To some extent, the Iron Order serves the purpose of a quasi-state agency,” he says. “They create incidents that allow the police to entrap and prosecute other motorcycle clubs.” Members of the North Phoenix Iron Order did not respond to interview requests.

It’s a far-fetched theory, but Davis believes a reprisal shooting is far-fetched, too.

Case 1:20-cv-00778-MSC Document 90-3 Filed 06/29/22 Page 19 of 35
873
“Motorcycle outlaws are actually more disciplined than most grown men,” Davis explains. The military influence really comes into it. They fight duels over matters of honor... But as far as conspiring to kill somebody? That’s increasingly rare, just because they’re under so much heat and surveillance. It’s tough to get away with.”

Related Posts



PHOENIX

For more than 50 years, PHOENIX magazine’s experienced writers, editors, and designers have captured all sides of the Valley with award-winning and insightful writing, and groundbreaking report and design. Our expository features, narratives, profiles, and investigative features keep our 385,000 readers in touch with the Valley’s latest trends, events, personalities and places.

THE SPOKESMAN-REVIEW

Washington Idaho WA Government

NEWS > SPOKANE

Man shot at Hells Angels clubhouse not cooperating with police

Thu., April 23, 2015



By **Nina Culver** 
nculver47@gmail.com

The man shot at the Hells Angels clubhouse in East Central Spokane Sunday is not cooperating with police who are investigating the incident and told officers he “didn’t want to be a victim,” according to court documents.

The two men who drove the victim, identified as Logan J. Wood, to the hospital to be treated for his wound also refused to tell police anything other than they were at the clubhouse at 1306 E. Sprague Ave., court records say. The victim was shot in the back.

All three men denied being members of the Hells Angels, but one asked police for permission to retrieve his “cuts” from the trunk of the car used to drive the victim to the hospital before officers impounded it as evidence. The term “cuts” is commonly used to refer to a Hells Angels motorcycle vest, according to court documents.

Both Wood and one of the men who drove him to the hospital are convicted felons.

Police responded to the clubhouse just before 11:30 a.m. Sunday after a 911 caller reported hearing gunshots. One witness told police that she saw a red truck and a black car driving quickly away from the clubhouse after the gunshots were heard. She also saw several men get into a red car and drive away after taking off their motorcycle vests and putting them in the trunk of the car, according to court documents. A second witness gave similar information to police.

Several men who told police they had been in the backyard of the clubhouse that day denied any knowledge of the shooting.

Police found six 9 mm cartridge cases in the street outside the clubhouse, according to court records. There were six motorcycles parked out front. One appeared to have been hit by a bullet on the front fender and a helmet placed on one of the motorcycles had a bullet hole in it. One bullet was removed from the front wall of the building.

Investigators also found three loaded guns sitting in plain view on a countertop inside the clubhouse – a .38-caliber derringer, a .22-caliber revolver and a .45-caliber Sig Sauer semi-automatic handgun, court documents say.

Police recently said on Twitter that the department has responded to the Hells Angels clubhouse 19 times since January 2013.



Subscribe to the Coronavirus newsletter

Get the day's latest Coronavirus news delivered to your inbox by subscribing to our newsletter.

[Sign up](#)

 Subscribe and login to the Spokesman-Review to read and comment on this story

More like this

TUE., MAY 5, 2020

[Cannon Park shooting that injured 3 stemmed from threats on social media, documents say](#)

https://www.richmond.com/news/local/crime/mongols-motorcycle-club-member-denied-bond-in-attack-near-vcu/article_bbf9f401-b886-51f8-b873-b727169103b3.html

'Mongols' motorcycle club member denied bond in attack near VCU

By TED STRONG Richmond Times-Dispatch
Dec 2, 2015



Bovender
RICHMOND POLICE



Justin T. Bovender

A Mongols Motorcycle Club member charged with breaking the eye socket of a man wearing a Hell's Angels shirt during an attack near VCU was denied bond Wednesday.

Justin T. Bovender, 34, is facing one count of malicious wounding and two gang participation charges in connection with the Sept. 24 assault. He is also expected to face additional charges related to guns and drugs found during a search of a Mechanicsville Turnpike house, a prosecutor said.

Bovender, a strength coach by trade, is listed in court records as being 6 feet, 4 inches tall and 256 pounds. His head is shaven, and covered in a variety of tattoos, including one on the back that reads “Mongols.” His attorney, Craig Cooley, did not dispute Bovender’s membership in the club.

After the incident, Bovender told a Richmond police lieutenant in a weight room that he had gotten into a fight with a man because the person was involved with the Hell’s Angels, Assistant Commonwealth’s Attorney Brooke Pettit said in court.

On Sept. 24, the victim in the case was helping a friend pick up a piece of restaurant equipment from a company on West Broad Street, according to an affidavit filed by a Richmond police detective seeking a search warrant. He was wearing a shirt that “showed support for the Hell’s Angels,” according to the statement.

When the man in the Hell's Angels shirt finished at the store, he found that his helmet was missing from his motorcycle, according to the affidavit. Later, he noticed a BMW following him. When the victim stopped for a traffic light in the 100 block of South Belvidere Street, the man driving the BMW got out, according to affidavit.

The man from the BMW, whom prosecutors allege was Bovender, told the man in the Hell's Angels shirt to meet him at the 7-Eleven on the corner if he wanted his helmet back, according to the statement. When the man in the Hell's Angel's shirt turned to look at the 7-Eleven, prosecutors allege, Bovender hit him, and continued striking him.

The beating broke the victim's eye socket, Pettit said at the hearing. A VCU security camera recorded the incident, Pettit said. The video was not shown in court.

A later search of a house used by the Mongols turned up a banner, Mongols vests, drugs and more than a dozen firearms, including three linked to Bovender: a Mossberg shotgun, a Glock pistol and an SKS rifle, Pettit said. The SKS was the military rifle of many communist states before the adoption of the AK-47.

While Cooley emphasized Bovender's ties in the community, Richmond Circuit Court Judge Margaret P. Spencer sided with the prosecution and denied bond.

https://www.bakersfield.com/news/breaking/judge-slashes-bail-amount-for-alleged-hells-angels-member-accused-in-rose-dale-stabbing/article_5a856dfe-55eb-590f-899d-d422c40fc6b2.html

Judge slashes bail amount for alleged Hells Angels member accused in Rosedale stabbing

BY JOHN COX jco @baker field com
Feb 19, 2016



Jonathan Smith pleaded not guilty to assault with a deadly weapon in an alleged biker gang fight on Rosedale Hwy. He is also charged with participation in a criminal street gang. At right is attorney H.A. Sala.

Felix Adamo / The Californian

A judge lowered the bail amount Friday for an alleged member of the Hells Angels motorcycle gang accused of assault during a confrontation last month on Rosedale Highway.

Kern County Superior Court Judge Colette M. Humphrey reduced Jonathan Cole Smith's bail from \$1 million to \$75,000 after hearing testimony the money would come only from legitimate sources.

Smith, 40, has pleaded not guilty to felony charges of assault with a deadly weapon other than a gun and participation in a criminal street gang.

Smith's attorney, H.A. Sala, said in an interview bail would be posted by the end of the day. Smith's next court hearing is set for Tuesday.

Arthur McAdams, an oilman who formerly employed the defendant, testified Friday he would put up the roughly \$5,000 required to bail out Smith. Bail agent Steve Sparacino testified he would only accept the money from McAdams.

Sala told the judge his client would repay McAdams out of a pending \$500,000 settlement Smith expects to receive because of his involvement in a 2014 motorcycle accident.

In a court filing, Sala wrote Smith is not a flight risk. He asserted the defendant has significant ties to the community and is not a threat to public safety. The only witness who has said Smith wielded a weapon is the biker gang member the defendant allegedly assaulted, Sala added.

Police reports say Smith and another alleged member of the Hells Angels, 55-year-old Michael Blackwood, were in a red pickup following an unnamed member of a rival gang, the Mongols, on eastbound Rosemead Highway the afternoon of Jan. 26.

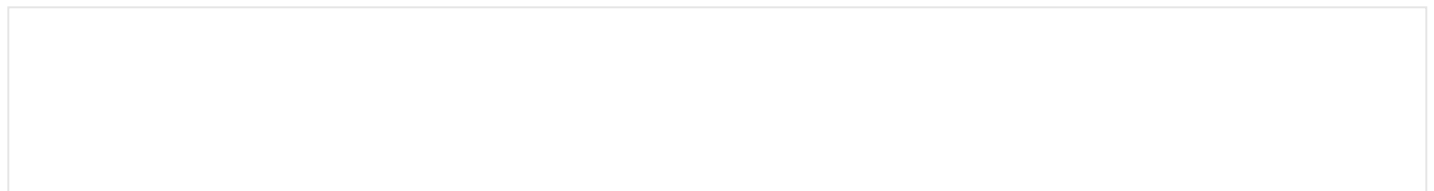
When the Mongol came to a stop on his motorcycle at a red light, the reports quote the unidentified man as saying, Smith yelled an expletive, then pulled a knife and grabbed him. The Mongol said this knocked down the bike on top of him but that he was able to pull a knife, get up and stab Smith twice.

Blackwood then exited the truck and the Mongol, outnumbered, tried to flee by jumping onto a passing pickup, which swerved and dragged him across the intersection.

Smith was later taken to a local hospital and treated for serious injuries.

Blackwood is free on bail on the same charges, along with a count of being an accessory to a crime.

MORE INFORMATION





Stabbing on Rosedale involved Hells Angels and Mongols members, court filings say

Alleged motorcycle gang member pleads not guilty to assault charge

VALLEY NEWS ([HTTPS://WWW.PHOENIXMAG.COM/CATEGORY/PEOPLE/VALLEY-NEWS/](https://www.phoenixmag.com/category/people/valley-news/))

Open Road?

CRAIG OUTHIER ([HTTPS://WWW.PHOENIXMAG.COM/AUTHOR/COUTHIER/](https://www.phoenixmag.com/author/couthier/)) | February 21, 2018

u=r

sta





A Tucson Police Department incident report obtained by PHOENIX magazine lays out the scene. On June 24, 2017, about a dozen members of the Black Kingz motorcycle club (MC) – an affiliate of The Outlaws, a major “one-percenter” MC based mainly in the U.S. Midwest and Southeast, with no documented presence in Tucson – were enjoying a group outing at Venom show club on Tucson’s east side. Shortly after midnight, two Black Kingz members, 33-year-old Davaress Bolden and 23-year-old Frederic Bayles, went inside the club’s bathroom, followed a few seconds later by a 64-year-old strip-club gadfly named Tommy Hook, who was not known to have any ties to the bikers. However, he did have a reputation for “[offending] people with his comments,” according to an employee of the club. Another witness was less subtle: The one-time federal auditor was “a piece of shit” who got into a lot of fights.

What exactly transpired between the three men after entering the bathroom is uncertain, but Hook stormed out about 30 seconds later and summoned an acquaintance sitting at the bar. Hook re-entered the bathroom with his friend in tow. According to a statement later obtained from Hook’s friend, the two bikers – Bolden and Bayles – and Hook exchanged angry words, and the bikers beat him “with their hands.”

Sadly, Hook’s propensity for getting into scrapes with fellow strip-club habitués would be his final undoing on this particular evening. Summoned by his friend, a pair of doormen found Hook on the bathroom floor in a pool of his own blood, with a fatal blunt-force head wound. Along with their Black Kingz confrères, Bolden and Bayles escaped into the night.

After a brief manhunt, both suspects were apprehended. Bayles, facing second-degree murder and aggravated assault charges, credibly claimed self-defense and ultimately plead down to class 4 negligent homicide with no incarceration. Bolden, who described himself as the biker gang’s “ring leader,” according to a witness, scored a similar deal.



These are the broad strokes of the case, but the devil – or the Angels, if you will – is in the details. According to witness statements in the TPD incident report, the Black Kingz were not in town merely for lap dances and bottle service. Likened by one witness to an outlaw-biker “farm team” or second-tier club, the Kingz were “in Tucson... to recruit new members and open up a branch.” Given their close ties to the bigger, better-known and more-feared Outlaws, it’s not a tremendous cognitive leap to assume they were laying the groundwork for an Outlaws chapter, as well. Although he was living in Phoenix at the time, and was arrested there, Bolden told a witness he hailed from Memphis – a city known to be Outlaws-dominant.

Insiders say such blatant MC prospecting would not have happened on Arizona soil 20, 10 or even five years ago. According to law enforcement officials, journalists and members of the MC community itself, Arizona is known unofficially as Hells Angels territory – and has been for decades.

But that could be changing. Along with the Tucson beating incident, several violent clashes in the Valley suggest alien MCs are getting more aggressive in Arizona, leading some observers within the outlaw-biker community to wonder if the Hells Angels – the world’s biggest, most illustrious motorcycle club, and one that’s still considered an organized crime syndicate by the U.S. Justice Department – are losing their exclusive grip on the Grand Canyon State.

Case 1:28-cr-0078-MSC Document 90-1 Filed 06/29/23 Page 28 of 35
886
“There’s an idea out there that Arizona is becoming an ‘open state,’” says one source with multiple ties to the local biker community, and who wished to remain anonymous. “What that means is, if you were an MC, and you wanted to ride through the state showing your logos and so forth, you had to get the HA’s permission. If you wanted to set up a chapter somewhere, you had to go to them, swear fealty to them, and get their permission. But that’s not the case anymore. It’s open.”

True or not, the perception of Arizona’s “openness” has likely drawn more MCs into the Valley – and some members of the state’s oldest and most entrenched bike club don’t appear to be ready to turn the other cheek.

On a typically hot, dry Arizona afternoon in October 2016, Hells Angels legend Sonny Barger quietly bid adieu to Cave Creek. It marked the end of a two-decade Arizona residency for the seminal outlaw biker, who punched his way into the popular consciousness in the pages of Hunter S. Thompson’s best-selling 1967 memoir *Hell’s Angels: The Strange and Terrible Saga of the Outlaw Motorcycle Gangs* while serving as the president and co-founder of the club’s influential Oakland charter.

Rolling Stone later called him “the baddest man on two wheels.” In the insular and doggedly secretive world of MCs, he’s the closest thing to a celebrity.

It would be disingenuous to call Barger “media-shy” – he holds court over 401,315 followers on Facebook, and maintains his own website – but he rarely engages the news media, particularly after undergoing a laryngectomy in the early 1980s while battling throat cancer. True to form, his lone public pronouncement on the topic of his departure from Arizona was elegant simplicity itself: “I want to announce that I have officially rejoined the Oakland Charter,” a Facebook post from August 22, 2016, reads. “Heading Home!”

The question is: Was Barger’s departure from Arizona an invitation for other MCs to move in? Most friends and affiliates of the club – don’t call it a gang, lest you get on their bad side – disavow such thinking. Now 79 years old, Barger is no longer a street enforcer and hasn’t been for some time, they point out. Moreover, the Hells Angels themselves contend they’re a decentralized organization – a confederacy, more or less – with independent charters that govern themselves and set their own agendas.

“It doesn’t matter where Sonny lives... the club is what it is,” Cave Creek resident Candy Chand says. Friendly with Barger and his wife, Zorana, Chand is an Oakland transplant who moved to Arizona around the same time as Barger and occasionally posts paean-like news columns to the now-defunct HuffPost contributor platform about the club. She also writes faith-based inspirational fiction – “Sonny calls them my ‘Jesus books,’” she says with a chuckle.

Though Chand doesn’t attend “supporter parties” or other club events, she has met many Arizona Hells Angels off-hours, and says Barger’s decamp for California did not cause much hand-wringing among them. “It doesn’t diminish them. [The Hells Angels] have charters all over the world.”



A quick bit of Arizona biker history: For several decades, dating back to the late '60s, the dominant MC in Arizona was a band of Harley-riding, hirsute reprobates called The Dirty Dozen. Named after the eponymous criminal soldiers in the Lee Marvin/Jim Brown action movie, the Dozen brawled mercilessly with rival clubs and became a main preoccupation of Arizona law enforcement during the 1970s and 1980s until “patching over” – e.g. merging – with the Hells Angels in 1997.

In an interview with PHOENIX in 2011, one of the architects of that merger – late Hells Angels street enforcer Robert “Chico” Mora – described how Dirty Dozen bikers sanitized Arizona of rivals before trading in their iconic double-six dice emblem for the Hells Angels Death Head patch.

“Oh, we were obnoxious assholes,” Mora cheerfully confided, describing the earlier club’s modus operandi. “We did terrible, depraved stuff all the time. Don’t get me wrong: The Hells Angels are every bit as tough. But it was a different culture back then. Much wilder.”

Part of that culture was engaging motorcycle-mounted rivals whenever and wherever they found them. In the early 1980s, Mora served three years in Florence State Prison for the shooting deaths of two members of Bad Company – an outlaw bike gang based in New Mexico that was attempting to set up a chapter in the old mining town of Globe.

Mora recalled that he summoned the two bikers to a popular roadhouse in Globe, where he laid out his ultimatum. “I told them to behave themselves,” Mora said. “And respect my authority. Then one of them pulled a gun on me. So I defended myself.”

Case 1:20-cr-00078-MSC-JEC Document 90-84 Filed 11/06/20 Page 28 of 88
888
Later, in the early 1990s, the Dozen waged warfare on another out-of-state club, called the Vagos, who were attempting to plant a flag on Arizona soil. Led by a biker named Don “Arizona Don” Halterman, the Vagos even managed to start a Phoenix chapter in the heart of Dirty Dozen territory.

The honeymoon period was brief, as described by former Arizona Department of Public Safety (DPS) officer Steve Trethewy. “There was some shooting and pipe-bombs. Somebody put a pipe-bomb on Arizona Don’s front door. That was it. There was too much heat on them. The Vagos left Phoenix.”

Such exploits did not go unnoticed by Barger as he served out a four-year conspiracy conviction in a medium-security federal prison near Black Canyon City from 1988 to 1992. In fact, his admiration for the Dirty Dozen may have facilitated his decision to leave Oakland for the Valley and its warmer, more salubrious climate. Faced with a friendly takeover offer from the one-and-only Hells Angels – essentially the Google of outlaw MCs – the Dozen had little choice. In 1997, members of the two clubs convened in the HA clubhouse in Oakland – a converted Arthur Murray dance studio, ironically – and the patch-over was consecrated.

By most accounts, Barger served in an emeritus or advisory capacity as a member of the Hells Angels Cave Creek charter – he didn’t hold an officer position, and was rarely seen at rallies and public events – supporting the contention that his departure carries mostly symbolic, rather than tactical, weight for the Arizona biker community.

But it’s also true that Barger’s vanishing act coincided with a general hemorrhaging of “old-guard [Arizona] guys who weren’t afraid to mix it up [with other MCs],” in the words of the anonymous source. In 2013, Mora – who held the title of “street warlord” during his Dirty Dozen days – died of natural causes. Soon after, Mike Koepke, a member of the club’s feared “Nomads” charter – and a principle figure in the much-publicized HA shootout with the Vagos in Prescott Valley in 2010 – retired from the club to start a career as a Prescott fireman (see PHOENIX August 2016).

Now firmly on the straight-and-narrow, Koepke says he no longer has regular contact with the Hells Angels and can’t comment on the club’s politics or motivations. But asked if he could recall an instance of seeing – or hearing about – a phalanx of enemy bikers riding unmolested on a major Arizona highway without the HA’s blessing, to a strip club or otherwise, he says, “No, I can’t recall that.”

Valley cocktail maestro Brandon Casey had barely taken possession of his new bar, The Woodshed, on Baseline Road in Tempe when the deadly biker melee erupted across the street.

The date was August 17, 2016 – about a week, coincidentally, before Barger’s Facebook announcement. According to Tempe Police Department spokesman Sgt. Ronald Elcock, four members of the Mongols MC – like the Hells Angels, a “one-percenter” club with roots in Southern California, but predominantly Latino – approached a single Hells Angel biker at the Final Round Sports Bar & Grill at Baseline and Mill Avenue. “The Hells Angel was by himself, and the [Mongol bikers] started a fight,” Elcock says, citing the official incident report.

Case 1:20-cr-00078-MG Document 90-84 Filed 06/29/23 Page 28 of 38
According to an ABC15 report the evening of the shooting, the fight spilled out into the parking lot, where the shooter – whom PHOENIX independently verified through court documents as Wayne Whitt, a member of the Hells Angels’ Mesa charter – fired six shots before fleeing on his bike, killing one of his assailants. Though Tempe PD declined to name the deceased, a GoFundMe page launched in the wake of the shooting suggests it was Richard “AZ Slick” Garcia, a member of the Mongols’ Mesa chapter. Tempe PD ultimately declined to press charges against Whitt, deeming the shooting self-defense. (The three surviving Mongols – Efren Ontiveros, John Magana and Frank Gardea – were all arrested and are still awaiting “adjudication,” according to Elcock.)

Covered by all local TV news stations, the shooting was an eye-opener, because it demonstrated how MC violence can erupt in unexpected places. The Mill/Baseline neighborhood in Tempe is not regarded as a rough neighborhood – the street is lined with white-collar offices, mid-level restaurants and apartments. Kiwanis Park is a block south.

“I was super surprised it happened,” says Casey, former head mixologist at Citizen Public House, who was interviewed by local TV reporters outside his bar the day after the shooting. “I grew up in downtown Tempe... Biker gang violence wasn’t a thing. So I [found it] more confusing than anything.”

The incident also illustrated the increased diversity of the Valley’s MC culture and, arguably, the spasms of violence that can happen without a clearly defined alpha. The Mongols claimed one Arizona chapter – Mesa, which operates its own Facebook page – in 2011. Today, a Mongols-affiliated website lists four chapters in the Valley, though MC experts in law enforcement caution that clubs sometimes inflate their numbers. The Arizona Hells Angels are believed to have around 100 active members, but an information request to DPS’ Gang & Immigration Intelligence Team Enforcement Mission (GIITEM), which oversees most MC-related investigations in Arizona, was not returned by the time this issue went to press.

If there is a larger battle brewing between the Hells Angels and Mongols, law enforcement isn’t saying. “We don’t have intelligence [to that effect],” Elcock says. “We haven’t heard about retaliation from that incident... and no rising tensions or any other shootings.”

A chat board on a website called AZ Independent Daily tells a slightly different story, with devotees of the two clubs trading racially tinged barbs and claims of dominance in the Valley. “Maybe if the Mongols didn’t fly their patch in AZ, where they are not endorsed by the CMC [Arizona Confederation of Motorcycle Clubs], they wouldn’t get into shootouts with the state’s dominant MC,” one user chides.

“Quit with your nonsense this was chicken head territory the Mongols are moving in like they took Cali away from the chicken heads,” a Mongol supporter responds, using a common epithet for the Hells Angels Death Head emblem.

Another poster makes reference to the unsolved murder of Hells Angels Cave Creek member Patrick Eberhardt, who was gunned down on his bike in North Phoenix in 2015. Sources close to the club have privately expressed surprise that the murder has not resulted in any public reprisals, especially given Eberhardt’s bloodlines – his father is Cave Creek charter president

Case 1:20-cr-00078-MGJ-CEB Document 90-84 Filed 06/29/23 Page 28 of 38
890
Robert “Spa Bob” Eberhardt. According to a Phoenix police report obtained by this magazine in 2015, one of the two unnamed suspects in the ongoing investigation into Eberhardt’s death is a Mongol member.

Then again, reprisals have a way of spinning out of hand for MCs, as the 170 indictments handed down in the wake of the well-publicized 2015 Hells Angels shootout in Waco, Texas, demonstrate. And online message boards rarely reflect diplomatic reality – fortunately.

Koepke, the retired Hells Angel – who escaped prosecution for the non-lethal Prescott Valley gun battle when it was revealed that one of the enemy combatants was a paid confidential informant – disavows the idea that the Arizona Hells Angels can or should go to war over territory.

“I don’t think it benefits anybody to have ongoing warfare and clashes [among MCs],” he says. “And [protecting territory] was certainly not something that was adopted or talked about when I was in the Hells Angels. If someone does something [threatening], you have a right to defend yourself... but anyone can start a club.”

One possible scenario: As Arizona grows in population and demographic complexity, the Hells Angels may have to accept a new reality – as they once did in California – where different clubs hold sway over different parts of the state.

If that is the case, bystanders like Casey just hope everyone in the Valley’s newly competitive MC community gets the memo. “We haven’t seen any bikers in the area since [the Tempe shooting],” he says. “But who knows? People are saying it’s a weird power-vacuum thing.”



MC Cheat Sheet

The term “one-percenter” was adopted by defiant outlaw bikers after organizers of the 1947 Hollister, Calif., biker rally insisted that troublemakers in the motorcycle world only constituted “one percent” of total membership. Know a few of them with this handy glossary.

Hells Angels

Founded by disaffected WWII vets in 1948, the “Red & White” achieved primacy in the biker world behind the emergence of its powerful Bay Area charters in the 1960s.

Also known as Green Nation, the MC was founded in Corona, Calif., in 1965. According to the DOJ, they boast around 600 members in the U.S., including some in Northern AZ.

Mongols

Founded by Hispanic Vietnam War vets, the MC memorably brawled with HA in the deadly Laughlin riot of 2002. They're believed to have a growing Valley presence.

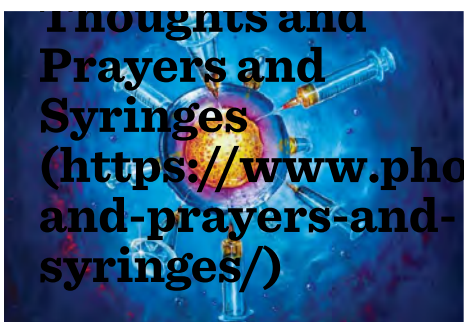
Outlaws

America's oldest MC (est. 1935) has no known AZ presence, but is a longtime HA rival; Barger's 1988 federal conviction stemmed from an alleged plot to blow up an Outlaws clubhouse.

BIKERS ([HTTPS://WWW.PHOENIXMAG.COM/TAG/BIKERS/](https://www.phoenixmag.com/tag/bikers/))

MOTORCYCLES ([HTTPS://WWW.PHOENIXMAG.COM/TAG/MOTORCYCLES/](https://www.phoenixmag.com/tag/motorcycles/))

Related Posts





ORANGE COUNTY'S LEADING SOURCE OF NEWS, CULTURE AND ENTERTAINMENT

JOSHUA HERBERT OF MONGOLS HELD IN KILLING OF HELLS ANGEL JAMES DUTY OF ORANGE

MATT COKER | JUNE 23, 2017



UPDATE, JUNE 23, 3:01 P.M.: *Joshua Ryan Herbert, 27, of Corona, has been formally charged in Riverside County with first-degree murder, attempted murder, a special circumstance allegation of killing for the benefit of a gang and sentencing enhancements for use of a gun and great bodily injury.*

Held without bail at the Robert Presley Detention Center in Riverside, Herbert is scheduled to be arraigned this afternoon at the Riverside Hall of Justice.



The Riverside Police Department has released more details about the fatal shooting of James “Floppy” Duty: He was fueling up with four fellow Hells Angels bikers at the Shell station just off of the 91 freeway. Herbert and another person, who remains at large and has not been identified, allegedly drove by and opened fire. Duty was struck multiple times. A bullet only grazed the helmet of the unidentified Hells Angels member who was not injured. The attackers fled toward the freeway. The Anaheim Police Department, the California Highway Patrol, the Garden Grove Police Department, the Long Beach Police Department and other agencies helped Riverside police investigators determine the Mongols was responsible for the shootings, Detective Jim Simons told City News Service. That led to search warrants being served earlier this week in Anaheim, Cathedral City, Corona, Garden Grove, Huntington Beach and Riverside. Herbert, who was no previous felony convictions, was taken into custody without incident Wednesday at his residence on Monterey Peninsula Drive. Police say the handgun that killed Duty was seized during the raids, as were other firearms and various gang paraphernalia. Anyone with information that can help investigators can call Simons at 951.353.7138.

ORIGINAL POST, JUNE 23, 6:19 A.M.: A 27-year-old man has been arrested for the murder of an Orange man who belonged to the Hells Angels, according to authorities.

James Duty, 31, was with some fellow Angels flying colors at a Shell gas station in Riverside on May 21, when they were ambushed by members of the longtime rival motorcycle gang the Mongols, says the Riverside Police Department.

Duty, whose nickname was “Floppy,” and another member of the Hells Angels were struck by gunfire; the Orange resident later died at a hospital.

The other victim, who was not identified, was shot in the head, but his helmet deflected the bullet and he was not injured.

Riverside cops announced Thursday that Joshua Herbert, a member of the Mongols, has been arrested for Duty’s slaying and the attempted murder of the second shooting victim.

There is nothing to indicate Herbert knew either victim before opening fire, police add.



MATT COKER

OC Weekly Editor-in-Chief Matt Coker has been engaging, enraging and entertaining readers of newspapers, magazines and websites for decades. He spent the first 13 years of his career in journalism at daily newspapers before “graduating” to *OC Weekly* in 1995 as the alternative newsweekly’s first calendar editor.



 NEWS

WATCH

83°

95°

99°

ADVERTISEMENT

Search Site

Police: Fight between motorcycle gangs behind deadly shooting on Buck Owens Blvd

by Eyewitness News staff
Tuesday, May 8th 2018

AA



Police investigate a shooting outside of Zingo's Cafe on Buck Owens Boulevard in Bakersfield, Calif., Saturday, May 5, 2018. (KBAK/KBFX photo)

BAKERSFIELD, Calif. (KBAK/KBFX) — A confrontation between two rival biker gangs led to the shooting of [Ricardo Viera](#) last Saturday, according to Bakersfield police.

897

Jack of Buck Owe
g part.

83°

95°

99°

s of the

WATCH

During the event, members of the Mongols Motorcycle Club showed up, and police said a fight soon started.

Search Site

n a car

and began to fire it into a crowd, police said.

One person was hit by the gunfire, and they suffered minor injuries.

Police said another person who was attending the event saw Viera firing the shotgun, and they retrieved their legally owned handgun and shot several rounds at Viera.

He was struck by a round and killed.

Afterwards, the person who shot Viera called police to report their involvement in the shooting.

The person was [detained and extensively interviewed](#), however that person were released as police said they don't anticipate "future charges are forthcoming."

The name of the person who shot Viera is being withheld due to threats of retaliation.

Investigators believe Viera's attempt to shoot at rival gang members was motivated by his affiliation with the Mongols.

Anyone with any further information about this case is asked to call Detective Shane Shaff at (661) 326-3861.

MORE TO EXPLORE

Disgraced former BPD detective Damacio Diaz released from federal custody

NEWS > CRIME + PUBLIC SAFETY

Motorcyclist shot, killed on 210 Freeway in San Bernardino



San Bernardino Police detectives investigate the scene of a homicide where two motorcyclists were shot and one killed on the 210 Freeway early Friday, June 6, 2018 in San Bernardino prompting authorities to shut down the eastbound lanes of the freeway and the transition road to the 215 Freeway. (Photo by Watchara Phomicinda, The Press-Enterprise/SCNG)

By **BEATRIZ E. VALENZUELA** | bvalenzuela@scng.com | San Bernardino Sun

PUBLISHED: July 6, 2018 at 7:05 a.m. | UPDATED: July 6, 2018 at 2:01 p.m.



A motorcyclist was shot and killed on the 210 Freeway early Friday, with a second motorcyclist getting wounded, San Bernardino police said.

Police identified the man killed as Shawn Fowler, 44, of Utah.

Fowler was traveling eastbound on the 210 near the 215 Freeway with his wife on the same bike and other riders through San Bernardino when someone experienced mechanical issues with their motorcycle, Lt. Mike Madden said.

Fowler and another rider pulled over to the side of the freeway and a short time later, around 4 a.m., shots rang out. Fowler's wife was not injured.

Initial information indicates the shooter may have been traveling in the opposite direction when the shooting took place, officials said.

Police ask anyone who may have witnessed the shooting to contact the San Bernardino Police Department at 909-384-5742.

[Newsroom Guidelines](#)

[News Tips](#)

[Contact Us](#)

[Report an Error](#)



The Trust Project

Be the first to know about Coronavirus coverage and more.



https://www.bakersfield.com/news/man-affiliated-with-mongols-motorcycle-gang-sentenced-for-role-in-fatal-gunfight-with-hells-angels/article_a00a59ec-1b4f-11e9-a0dd-4340a58a5695.html

Man affiliated with Mongols motorcycle gang sentenced for role in fatal gunfight with Hells Angels

BY JASON KOTOWSKI jkotowski@bakersfield.com
Jan 18, 2019

A Bakersfield man affiliated with the Mongols motorcycle gang was sentenced Friday in connection with a fatal gunfight that occurred between the gang and the rival Hells Angels gang last year.

Christopher Clay Wilson, 40, was sentenced to time served and three years' probation on an accessory charge to which he pleaded no contest in August. Other charges, including five counts of attempted murder, were dismissed.

The charges stemmed from a fatal shooting that occurred in June at a motorcycle wash fundraiser organized by the local chapter of the Hells Angels in the 3200 block of Buck Owens Boulevard.

Wilson and other affiliates and members of the Mongols showed up at the event to confront the Hells Angels, according to police. One Mongol, Ricardo Viera, armed himself with a pump-action pistol grip shotgun and waited in a gas station parking lot.

Meanwhile, two other Mongols affiliates brandished metal objects and challenged Hells Angels at the event, police said. They lured several Hells Angels into the gas station parking lot, and Viera opened fire on them.

A person at the wash then armed himself with a handgun and fired several rounds at Viera, killing him.

Wilson and the other affiliates — Arturo Desiderio, 38, and Eliseo Ray Miranda, 46 — fled the scene but were arrested soon after the incident.

Desiderio and Miranda remain charged with attempted murder, among other crimes, and are scheduled to go to trial next month.

The person who fatally shot Viera was not charged with a crime because police said witness statements and video evidence backed up his statement that he acted in self-defense. His name was not released, but police said he was in possession of numerous items consistent with being affiliated with the Hells Angels.


MORE INFORMATION



Recent high-profile incidents shine a light on local outlaw motorcycle gangs

CORONAVIRUS (COVID-19) RESOURCE CENTER

[READ MORE \(/PS/CORONAVIRUS/\)](#)

 Add To Favorites (/MyAccount/Apps/favorites/Myfavorites.aspx?
favChannel=myLibrary&favTitle=102859&favDesc=News&favUrl=)

RECENT HIGH-PROFILE INCIDENTS SHINE A LIGHT ON LOCAL OUTLAW MOTORCYCLE GANGS

The Bakersfield Californian - 3/16/2019

March 16-- Mar. 16--They cut an imposing figure.

Heads turn and people tend to keep their distance when members of Bakersfield's local outlaw motorcycle gangs enter an establishment. Instantly recognizable due to their leather vests with patches proclaiming their affiliation, these groups historically have a reputation for violence.

Some recent incidents involving the groups have only furthered that reputation. One was a deadly stabbing at a popular dive bar involving two motorcycle gang members, the other an exchange of gunshots in broad daylight during a fundraiser on Buck Owens Boulevard.

Those who spot members of a biker gang are best advised to leave them alone. Anyone who starts trouble could quickly find himself surrounded and in extreme physical danger.

"They engage in acts of violence or drug sales as needed," said Senior Police Officer Louis James, of the Bakersfield Police Department's gang unit.

"If one engages in a physical altercation, the others will engage, too," he said.

The Hells Angels, Mongols and Devils Diciples all have a presence in the Bakersfield area, with the Hells Angels maintaining a clubhouse in the Oildale area. James said the Mongols claim to have a clubhouse locally but he's never seen it.

While the Devils Diciples have a Bakesfield patch, they don't have a clubhouse here. There are also several Vagos members in town, James said.

Dive bars are the usual hangout for these groups, but they sometimes turn up in unexpected places. For example, James said, police received a call of some biker gang members at Wiki's Wine Dive & Grill, an upscale establishment.

Their numbers are relatively small, but there's something about biker gang members, probably due to their reputation, that people generally become more concerned if they see a fight break out between them, according to James.

Those who join these gangs are referred to as "1-percenters," taken from a quote from the American Motorcycle Association saying 99 percent of motorcycle riders abide by the law. The implication is these 1 percent don't.

Exact numbers can be hard to tally because some members may be living in town while others might be from a chapter in another city stopping in for a fundraiser or other event.

The officer gave the following estimates for local biker gang members:

- * Hells Angels: more than 20.
- * Devils Diciples: more than 10.
- * Mongols: more than 10.
- * Vagos: fewer than 10.

RECENT INCIDENTS AND RIVALRIES

Last month, Hells Angels affiliate Michael Adam Morales, 32, was fatally stabbed at Guthrie's Alley Cat in downtown Bakersfield. His accused killer is Russell Vannoy, 60, a member of Devils Diciples.

There previously was no rivalry between the two gangs, but James said the killing of Morales, known as "Mikey Smash," has the potential to cause trouble between the two. He said he doesn't know if there are meetings going on between the hierarchies of the two groups to make peace, or if this is possibly the start of a rivalry.

In another high-profile case, members of the Mongols gang in May showed up at a Hells Angels bike wash to provoke the rival gang. Police said one of the Mongols, Ricardo Viera, fired a round from a pump-action pistol grip shotgun into a crowd of people at the event, injuring at least one person.

A Hells Angels affiliate, whose name was never released, armed himself with a handgun and fired several rounds at Viera, killing him. Three Mongols were later charged with multiple offenses in connection with the incident. The Hells Angels affiliate was not charged after it was determined he acted in self-defense.

There has long been a rivalry between the Mongols and Hells Angels. In an incident that made national news, a massive brawl between the two groups broke out at a Nevada casino in 2002. A Mongol was stabbed to death and two Hells Angels fatally shot during the melee.

In Bakersfield, James said, a lot of the incidents of violence involving these gangs don't involve firearms. Most are assaults, not shootings.

Police step up enforcement after incidents involving them, James said, to determine who is on probation or parole and let them know they're keeping an eye on them.

MEMBERSHIP AND INSIGNIA

Some biker gang members may be unemployed. Others hold down jobs with six-figure salaries. James recalled a case in which a gangster from out of town was employed as a defense attorney.

Regarding those members with full-time jobs, James said, "They got in the gang at one point and remained there yet are still successful in their normal life. They still attend meetings and participate in runs."

Usually, James said, biker gang members are civil if police contact them asking about a motorcycle run or what they've been doing in general. They typically begin getting agitated if questioned regarding specific crimes.

Those who are the most confrontational are the "prospects," which are bikers interested in joining the gang but who are on a probationary period -- typically a year -- before becoming full-fledged members allowed to wear the group's full patch. Prospects are expected to prove their loyalty and engage in activities as directed by members.

They're the ones most likely to be arrested.

A word about those patches: members have been known to kill over them. Even something as simple as tapping a gang member on the back and touching the patch can lead to a beating or worse.

"They consider the patch one of their most prized possessions," James said.

Each gang has its own insignia. The Hells Angels' insignia is a death's head with wings, the Mongols' a cartoon Genghis Khan-like figure riding a motorcycle, the Devils Diciples' a wheel with tridents crossing it and the Vagos' features Loki, the god of mischief in Norse mythology.

James asked that anyone who sees a large gathering of biker gang members notify police so they can check out the situation and identify who they are and what chapter they're from. Also notify police if outlaw motorcycle gangs are spotted at a bar.

There's always the potential for violence if a rival group show up.

"We don't want any members to get killed or injured, or any bystanders either," James said.

Jason Kotowski can be reached at 661-395-7491. Follow him on Twitter: @tbcbreakingnews.

(c)2019 The Bakersfield Californian (Bakersfield, Calif.)

Visit The Bakersfield Californian (Bakersfield, Calif.) at www.bakersfield.com

Distributed by Tribune Content Agency, LLC.

Nationwide News

[🔗 OPINION: Crosby: New program in Aurora putting more focus on crisis intervention \(/ps/news-article-detail.aspx?id=114521\).](/ps/news-article-detail.aspx?id=114521)

[🔗 Pandemic a setback to St. Paul's Ujamaa Place, a helper to black men on the margins \(/ps/news-article-detail.aspx?id=114476\).](/ps/news-article-detail.aspx?id=114476)

[🔗 News Archive \(/ps/news-archive.aspx\).](/ps/news-archive.aspx)



(<http://www.trilogyir.com/>)

FOR TECHNICAL ASSISTANCE:

✉ admin@trilogyir.com ([mailto:admin@trilogyir.com?Subject=From Network of Care](mailto:admin@trilogyir.com?Subject=From%20Network%20of%20Care))



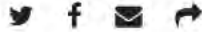
Shooting scene on Highway 395 near Pasco

Raw footage from the shooting scene investigation on Highway 395 about three miles north of Pasco. Multiple law enforcement agencies responded after receiving reports of a man that was shot. Northbound lanes were closed temporarily during the investigation. BY BOB BRAWDY

UP NEXT



SEPTEMBER 02, 2017 12:13 PM , UPDATED SEPTEMBER 02, 2017 01:05 PM



Raw footage from the shooting scene investigation on Highway 395 about three miles north of Pasco. Multiple law enforcement agencies responded after receiving reports of a man that was shot. Northbound lanes were closed temporarily during the investigation. BY BOB BRAWDY



Listen to this article now

05:41 Powered by **Trinity Audio**

After a Hells Angels member from California was shot in the leg while passing through Pasco, witnesses clammed up and refused to share anything with detectives.

Two weeks later, state investigators are hopeful people will come forward to give some clues into [what happened that Aug. 18 afternoon](#) on Highway 395.

The wounded motorcyclist, Dennis Donahue, 52, has since been released from the hospital. And [five of his fellow members](#), who were arrested on suspicion of criminal mischief with a deadly weapon, posted bail and have not been charged.

TOP ARTICLES



Shooting scene on Highway 395 near Pasco

Raw footage from the shooting scene investigation on Highway 395 about three miles north of Pasco. Multiple law enforcement agencies responded after receiving reports of a man that was shot. Northbound lanes were closed temporarily during the investigation. BY BOB BRAWDY

UP NEXT



Tri-Cities area COVID deaths top 100. New cases still far above reopening target

“This was a very kind of chaotic situation where it stretched over a lot of miles,” said Lt. Randy Hullinger with the Washington State Patrol’s criminal investigation division. “I think it would be hard to go through an experience like that and not be scared ... (but) I don’t know what completely their reason is” for not cooperating.

Hullinger described it as “an interesting circumstance” because people who were victims at different points in the road rage incident won’t tell anything to investigators.

“We know that there’s somebody out there who saw something, it’s that they just haven’t (seen the news reports) yet” asking for witnesses, said Hullinger. “... It doesn’t matter how big or small they think their information is. We’d love to talk to them because sometimes as we talk, other details will start to come out.”

Breaking news & more

Sign up for one of our many newsletters to be the first to know when big news breaks

SIGN UP

The altercation is believed to have started on Highway 395 near Clearwater Avenue in Kennewick with motorcycles, vehicles and pickups driving erratically. It continued north over the blue bridge and through Pasco, briefly onto eastbound Interstate 182, and then back onto Highway 395 heading toward Spokane.

Hullinger said they know that others were involved aside from Donahue and the five men arrested. Those other motorcycles and vehicles likely sped off onto side streets from Highway 395 and Interstate 182 in an attempt to either get away or hide, he said.

That’s why investigators think there are more potential witnesses who just don’t realize they saw something important. Even if they didn’t see the actual shooting of Donahue on northbound Highway 395 near the King City Truck Stop, they may have



Shooting scene on Highway 395 near Pasco

Raw footage from the shooting scene investigation on Highway 395 about three miles north of Pasco. Multiple law enforcement agencies responded after receiving reports of a man that was shot. Northbound lanes were closed temporarily during the investigation.

BY BOB BRAWDY

UP NEXT X

Local news has never been more important

Subscribe for unlimited digital access to the news that matters to your community

#READLOCAL

Three motorcycles then pulled onto the shoulder ahead of him and one rider pointed a handgun at the man, according to court documents. The man, who called 911, said the other two riders appeared to talk to their buddy for a moment and then the third guy put the gun in his waistband and they drove off.

The witness further said that after fixing his vehicle, he continued north on Highway 395 and, as he passed the shooting scene, he recognized those same three motorcyclists on the side of the highway, documents said.

Investigators have determined that based on the timing of the witness' call to emergency dispatchers, the gun was pointed at him "within moments" of Donahue being shot in the left leg.

When troopers, police and deputies responded to the shooting, they found five motorcycles stopped on the shoulder along with a Chevrolet Silverado. The pickup was traveling with the group of motorcyclists.

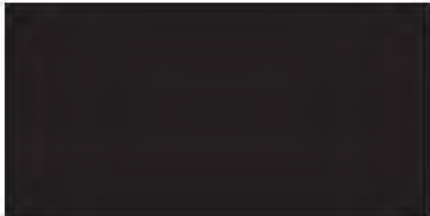
Bullets reportedly damaged three motorcycles, and a bloody pistol was found about 15 feet away from the parked motorcycles.

Hullinger said they are fairly confident that someone from a different group of motorcycles or another vehicle shot Donahue. Additionally, Donahue is not the rider who pointed the gun at the disabled motorist moments before, he said.

The five people arrested that day would not speak to investigators about what happened.

The men — all from California, ranging in age from 47 to 66 and identified as Hells Angels members based on their clothing and motorcycles markings — were booked into the Franklin County jail on the criminal mischief allegation. Two of them also were accused of unlawfully possessing a firearm.

The Hells Angels Motorcycle Club is considered a criminal gang by the U.S. Department of Justice.



Shooting scene on Highway 395 near Pasco

Raw footage from the shooting scene investigation on Highway 395 about three miles north of Pasco. Multiple law enforcement agencies responded after receiving reports of a man that was shot. Northbound lanes were closed temporarily during the investigation. BY BOB BRAWDY

UP NEXT



cellphones and the motorcycles. Sant said he hopes to get reports on those findings within two to four weeks, if not sooner.

Hullinger said the investigators don't yet know if it was a mutual combat situation, so they have to look at all angles of what might have led up to the shooting.

"The detectives are working diligently and we'll just keep plugging away until we see what we come up with," he said. "Everyone still is suspect in this thing until we can get it resolved."

People with information on the initial altercation, the eventual shooting or anything in between are asked to contact state patrol Detective Scott Neustel at [509-734-5818](tel:509-734-5818), [509-249-6743](tel:509-249-6743) or Scott.Neustel@wsp.wa.gov.

Kristin M. Kraemer: [509-582-1531](tel:509-582-1531), [@KristinMKraemer](https://twitter.com/KristinMKraemer)



Franklin County Sheriff deputies and Washington State Patrol trooper investigate the scene on Highway 395 about three miles north of Pasco, where a man was shot in the leg on Aug. 18. Witnesses have remained silent about the incident, which is still under investigation. Watch a video at tricityherald.com/video BOB BRAWDY TRI-CITY HERALD

[COMMENTS](#) ▼

READ NEXT

TRENDING STORIES


'Well is drying up.' Tri-Cities construction industry bracing for more layoffs

Exhibit 18

VALLEY NEWS ([HTTPS://WWW.PHOENIXMAG.COM/CATEGORY/PEOPLE/VALLEY-NEWS/](https://www.phoenixmag.com/category/people/valley-news/))

Hells Angels Shootout

EDITORIAL STAFF ([HTTPS://WWW.PHOENIXMAG.COM/AUTHOR/ESTAFF/](https://www.phoenixmag.com/author/estaff/)) | October 1, 2011


 https://www.phoenixmag.com/wp-content/uploads/2011/10/0150_001.jpg

Like most of their immediate neighbors in the sparse high-desert town of Chino Valley, Arizona, the Schafmans were familiar with the two-story stucco house opposite their multi-acre property on Yuma Drive. How could they not be? For many years, it was a well-trafficked Hells Angels hangout. Members of the colorfully named Skull Valley chapter, which was the Angels' main garrison in north-central Arizona until disbanding in 2006, used it as their clubhouse. A biker still lived there, but he was ailing and infirm, tethered to oxygen tanks and a motorized scooter. The house – which once roared with all-night bacchanals and fleets of hard-revving Harleys – had been silent for years.

Case 1:20-cv-01078-MEC Document 2008-1 Filed 10/20/23 Page 25 of 33
912
Less well known to the good people of Yuma Drive were the occupants of a house about 300 yards down the road. Michael Diecks and his wife, Leslie, had recently moved into the single-family home with their three children – an unremarkable arrangement if not for the fact that Diecks, also known as “Mad Dog Mike,” was a full-patch member of the Vagos motorcycle club.

The Hells Angels and Vagos – also known as “Green Nation” in the outlaw-biker world for their signature color – have a chippy history, to put it mildly. As so-called “one-percenter” MCs, they emerged from the same amniotic Southern California/Inland Empire biker culture to become bitter rivals, with the Angels playing the proud, powerful incumbents to the Vagos’ motivated upstarts. They’ve brawled hard and often. Over territory. Over nasty remarks. Over whatever.

“They’ve been going at it since the late ’60s,” according to Steve Trethewy, a former Arizona Department of Public Safety (DPS) officer who served 25 years on the department’s anti-gang unit. “They’ll fight, then go dormant, then fight again, then patch things up. It’s all about power and territory.”

 phm1011hellsangels 2
lg

Photos by Jason Koster

Had they been privy to this information, the citizens of Chino Valley might have been less startled by the pop-pop sound of gunfire that raked across Yuma Drive on Saturday, August 21, 2010, shortly after noon. In an instant, their grassy, wide-open neighborhood took on the guise of a Waziristan warzone. The Schafmans – who declined comment for this article – told investigators they heard “approximately 100 shots fired” during the 10-minute gunfight, but official estimates put the number closer to 50. The battle left five bikers wounded, netted 27 arrests and resulted in nine indictments. One year after the melee, virtually everything else about the case, which has yet to go to trial, is still in dispute. The Yavapai County Attorney accepts the Vagos’ account of the incident – in essence, that the Hells Angels fired on them unprovoked as they rode past the two-story stucco house, triggering the fusillade – while the Hells Angels and their attorneys broadly maintain that it was an ambush on the part of the Vagos.

For the actors involved, the who-shot-first question is paramount. For the rest of us, not so much. In fact, in a case that stokes age-old questions about Arizona’s most powerful bike club, hints at a potentially violent restructuring of the outlaw-biker pecking order and – pursuant to court documents obtained by PHOENIX magazine – reveals provocative details about the crime-fighting methodology of Arizona’s anti-gang units, the question of which band of well-armed hombres shot first seems mostly academic.

By most accounts, outlaw-biker affiliation is on the rise in Phoenix and elsewhere. So the more pressing question is: Will it happen again? And where?

As dozens of Yavapai Sheriff’s Office and DPS vehicles swarmed the neighborhood of Yuma Drive shortly after the shooting, a Vagos biker on the scene described the aftermath in no uncertain terms:

“We’re in a war.”

Well-groomed, fit and articulate, Koepke is part of the Hells Angels’ new guard. Even with his wrist-to-wrist tattoos, the 28-year-old ex-Army infantryman and aspiring Muay Thai prize-fighter seems more Team America than America’s Most Wanted. If he traded in the leather cuts for a pair of pleated wool slacks, Koepke could pass for a lawyer himself.

He’s also one of the six men – all associated with the Hells Angels’ Arizona Nomads chapter – facing prison time for the Chino Valley shootout, on a menagerie of charges ranging from aggravated assault to disorderly conduct with a weapon.

phm1011hellsangels 3 lg

Members of the Hells Angels Arizona Nomads chapter gather in Chino Valley, where last year’s shootout with rival bikers the Vagos erupted.

Koepke’s objection to the “gang” label isn’t just a matter of semantics; in fact, it carries very tangible legal consequences for the 2,500-member-strong worldwide organization. Arizona’s law enforcement entities – including its anti-gang task force, the multi-agency Gang & Immigration Intelligence Team Enforcement Mission (GIITEM) – classify the Hells Angels as a criminal street gang, which means courts can apply enhanced sentencing to lawbreakers. Simple assault becomes a multi-year stretch in prison. A bar fight becomes “felony riot.”

The Angels dispute the criteria. They claim to be mischaracterized and misunderstood, victims of a zealous law enforcement camp bent on crushing their authority-averse lifestyle.


Of course, the gang stigma is nothing new for the Hells Angels; it has faithfully accompanied them since the club’s earliest days in the Southern California steel town of Fontana, circa 1948, even as they grew into the world’s biggest and most recognized biker entity. Certainly, they can seem like a gang, with their iconic death-head patches and hard-as-nails mystique, but members readily tick off reason after reason why the “gang” descriptor doesn’t fit. Disavowing the stigma has itself become something of an institutional passion for the bikers; a sort of sacred incantation, like stone-writ Druidic verse. Certainly, the Angels’ larger-than-life reputation can salt the impressions of law enforcement personnel. Last November, Yavapai County Sheriff’s Office Detective David Zavos – the lead investigator in the Chino Valley case – offered a grand jury the following impressionistic analysis of the combatants: “The Vagos, for the most part, are not a real aggressive gang. They are somewhat family oriented, opposed to the Hells Angels, who are more into criminal enterprise.”

That makes Koepke shake his head. “Family oriented. I’m not sure what that means. I have a 1-year-old son and a wife, and I’m totally devoted to them. Doesn’t that make me family oriented? I’m not sure what it has to do with anything.”

similar reservations, kicking the original indictments back to a grand jury after weighing Zavos' testimony – a short-lived but significant legal victory for the Hells Angels. A defense counsel noted that the Vagos and Hells Angels have near-identical law enforcement profiles; both appear on a Department of Justice list of MCs with suspected involvement in serious crimes such as drug distribution and witness intimidation.

A Vagos member involved in the shootout did not respond to an interview request through an attorney.

From the beginning, the Chino Valley case seemed freighted with special small-town tensions. Ironically, one of the accused Angels – Larry “Scotty” Scott, a former college football player and on-again, off-again thoroughbred racehorse owner – previously coached Zavos' teenage son in his capacity as the defensive coordinator for a local high school team. “[The detective] told me my days as a coach were done,” Scott, who has since left the team, alleges.

 Privately, the Angels acknowledge that some of their members break the law, perhaps even at a statistical pace higher than non-bikers.

But they deny that criminal activity is an institutional part of the Hells Angels culture, or that the club maintains a criminal hierarchy within its ranks, à la the Mafia and other corporatized criminal rackets. Richard Gaxiola, a Phoenix-based attorney who represents Koepke and has defended Hells Angels in previous cases, insists that the seven-point Arizona statute for defining a criminal street gang is “overly broad” and a “crass gambit for GITEM to justify government funding” by turning the Hells Angels into perennial hobgoblins.

“If you look at the street-gang criteria – self-proclamation, official clothing or colors, written correspondence and so on – then the Blue Knights, which are a national law-enforcement motorcycle club, they'd have to be classified a criminal street gang, too,” Gaxiola says. “At the end of the day, the Hells Angels is nothing more than a group of guys who love to ride motorcycles and hang out with like-minded individuals. Sure, some of them are knuckleheads, but most have jobs and wives and kids. Most of them are veterans. They're stand up guys.”

Though some law enforcement figures acknowledge the Angels' improved public image over the years – “I call it their spit-and-polish,” one DPS officer says – others point to ugly incidents, such as the murder of 44-year-old party guest Cynthia Yvonne Garcia by three members of the Mesa chapter in 2001. The Angels disavow the crime. They insist that each of their chapters are semi-autonomous entities with their own bylaws and values, and that applying the crimes of one member to the whole club makes as much sense as, say, penalizing the Phoenix PD for a corruption scandal in the LAPD.

6 lg

“We’re not a gang,” insists Hells Angels member Michael Koepke, holding his 1-year-old son. “We’re about brotherhood and riding bikes. And that’s it.”

Everybody is his own man in the Hells Angels,” one longtime member says. “Each chapter governs itself. That’s what the authorities never understand. I mean, there’s a chapter back east that doesn’t even let its members smoke pot. That’s why those conspiracy charges never stick. There’s no conspiracy.”

Naturally, the authorities tend to disagree. “They’re very well structured,” says Trethewy, now a spokesman for the law-enforcement think tank Rocky Mountain Information Network. “They have bylaws, they go to meetings and pay

dues, they use trademarks and copyrights, and they commit crime. I’d say that makes them a criminal organization.”

Trethewy dismisses the “few bad apples” notion, citing a recent internal DPS report that suggests the majority of the Arizona Hells Angels – who number somewhere around 110 – have rap sheets that include felony arrests: “That’s not a cross-section of society. I don’t care what you say.”

Still, federal and local authorities have had mixed success making racketeering and conspiracy charges – the Kanye and Jay Z of anti-organized crime legislation – stick to the Hells Angels over the years. The ATF’s much-trumpeted, multi-million-dollar Operation Black Biscuit – touted as “the most successful undercover operation ever pulled against an outlaw motorcycle club” when it culminated in 2003 – failed to yield any convictions for the 16 Arizona-based bikers charged with racketeering or running a criminal enterprise.

Black Biscuit initiated the demise of the Skull Valley chapter and temporarily hobbled the statewide club by jailing several of its top personnel, but in its aftermath, the Arizona Hells Angels were indistinguishable from their old selves: They were still the unquestioned lords of Arizona’s outlaw bikerdom.

It was hardly routine for the Hells Angels and the Vagos to have more than two dozen combined bikers in Chino Valley on the same weekend. The town was no longer an HA chapter seat, and only one of the Angels charged in the shootout was a Chino Valley resident. Meanwhile, the Vagos were believed to have only a scattered presence in Yavapai County; most of the suspects detained after the shooting were visiting from cities such as Kingman, Phoenix and Bullhead City.

So what brought them to Chino Valley if not to fight? Both clubs have credible alibis. For the Vagos, it was a bring-your-kids weekend barbecue at the Diecks’ place – a common enough pastime in the biker world. Meanwhile, the Angels were in town to visit Teddy Toth, the ailing ex-president of the Skull Valley Chapter. Sent to prison following the ATF’s Black Biscuit operation several years

phm1011hellsangels 7
lg

Larry “Scotty” Scott coached football at Chino Valley High School before the shootout. A Hells Angels prospect at the time, he’s since become a full-patch member.

It was undoubtedly a case of wrong-place, wrong-time, but to understand the tensions that led to the shootout, one must first examine the unique history of the Arizona Hells Angels and the band of Harley-riding, hirsute rogues that preceded them – a club called the Dirty Dozen, which ruled the state’s biker community from its inception in the late ’60s to its merger with the Hells Angels in 1997.

Named after the iconic World War II action movie starring Lee Marvin and Jim Brown, the Dirty Dozen – who numbered about 120 during their peak – offer a useful compare-and-contrast study with the current Hells Angels. The Cliff Notes version: The Dirty Dozen were several degrees more ruthless and aggressive, according to longtime member Robert “Chico” Mora, who “patched-over” to the Hells Angels during the aforementioned merger.

“Oh, we were obnoxious assholes,” Mora cheerfully confides when quizzed about the Dirty Dozen. “We did terrible, depraved stuff all the time. Don’t get me wrong: The Hells Angels are every bit as tough. But it was a different culture back then. Much wilder.”

A massive, wise-cracking hulk of a man with the letters A-R-I-Z-O-N-A tattooed across his belly and a scraggly mane of gray-streaked hair, Mora exudes Falstaffian delight as he recounts his days as a hell-raising, debauchery-crazed Dozen regular. There were orgies, brawls, all-night block parties and balls-out Harley sprints across greater Phoenix.

It was a fast, dangerous life. He points to the extensive scarring on his lower legs where surgeons stitched together the two limbs, including the blood vessels underneath, in a successful gambit to save a foot severed in a bike wreck. He was hospitalized for several weeks until the foot healed and doctors de-conjoined him.



phm1011hellsangels 8 md



phm1011hellsangels 9 md

Photos – From left: Also known as Green Nation, the Vagos motorcycle club was founded in Corona, California, in 1965. According to the DOJ, the club boasts approximately 600 members spanning 24 chapters in the U.S., and 10 more chapters in Mexico. In Arizona, they are concentrated in Mohave County. • Founded in Montebello, California in 1969 by Hispanic Vietnam War veterans, the Mongols M.C. memorably brawled with the Hells Angels in the deadly Laughlin, Nevada, riot of 2002. The Latino-majority club is believed to have a tertiary presence in Arizona, including a Mesa chapter that hosts its own Facebook page.

Dirty Dozen lore is full of wild tales. Old timers recall a weekend evening – sometime in the mid-'80s – when a pair of Dozen bikers cut the fuel lines on a row of rival motorcycles outside a bar in Mesa, creating a sort of daisy chain of flammable spillage. They then lit a makeshift fuse, inducing a spectacular inferno that they admired while munching on Jumbo Jacks down the street.

So the Dozen were hard-core. They were also intensely territorial, boldly confronting and intimidating any rival club that failed to recognize their primacy in Arizona. In the early 1980s, Mora himself served just more than three years in Florence State Prison for the shooting deaths of two members of Bad Company – an outlaw bike gang based in New Mexico that was attempting to set up a chapter in the old mining town of Globe. Mora – who was president of the Dirty Dozen's Globe chapter at the time – claims that the Bad Company bikers were harassing members of the community and “acting like jerks.”


Mora summoned the two bikers to a popular roadhouse in Globe, where he laid out his ultimatum. “I told them to behave themselves,” Mora recalls. “And respect my authority. Then one of them pulled a gun on me. So I defended myself.”

The Vagos were another out-of-state club that attempted to plant a flag in Arizona during the Dirty Dozen reign, according to Trethewy. In 1990, the Vagos even managed to start a Phoenix chapter in the heart of Dirty Dozen territory, led by a biker named Don “Arizona Don” Halterman.

The honeymoon period was brief.

“From what we know, that was the first time [the Dirty Dozen] and the Vagos squared off,” Trethewy says. “There was some shooting and pipe-bombs. Somebody put a pipe-bomb on Arizona Don's front door. That was it. There was too much heat on them. The Vagos left Phoenix.”

For the next seven or eight years, the Dozen ran a tight ship in Arizona. They also won the respect of seminal Hells Angels organizer Sonny Barger, who served out a four-year federal conspiracy conviction in Arizona from 1988 to 1992. By all accounts, Barger – who later moved to Cave Creek – took a serious shine to Arizona during his incarceration, which could only have facilitated matters when the Dirty Dozen weighed the Angels' offer of a friendly merger. In effect, the Dirty Dozen would be trading in their double-six dice emblem for the Angels' trademarked death-head skull patch.

 phm1011hellsangels
10 lg

Hells Angel Kevin Christensen
suffered a gunshot wound in the Chino

In 1997, members of the two clubs convened in the HA clubhouse in Oakland – a converted Arthur Murray dance studio, of all things – and the patch-over was consecrated. The benefits for both clubs were manifest. On one hand, the Hells Angels acquired a big, geographically critical state with lots of wide-open roads and no serious rivals, thanks to the Dozen's cleansing efforts. Conversely, the

former Dirty Dozen bikers scored instant prestige as members of the most powerful and recognizable brand in the biker world – the death-head patch promised them “a bigger playground,” in the words of Mora.

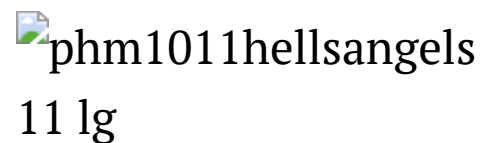
It also meant embracing the Hells Angels’ more image-savvy and disciplined ethos. According to Mora, the stereotype of the meth-slinging, brawl-seeking, recklessly hostile Hells Angel is a vestige of wilder times – something that continues to exist on the pages of Hunter S. Thompson’s Hell’s Angels: The Strange and Terrible Saga of the Outlaw Motorcycle Gangs, but not in real life. “I have a three-part gospel for staying the fuck out of prison,” Mora explains. “One: Don’t commit senseless, needless violence against the citizenry. Two: Don’t sling dope. And three: Don’t print the government’s money. Follow those rules, and the cops will more or less leave you alone.”

Indeed, there’s an adage in the biker world that the safest neighborhood in any city is the one with a Hells Angels clubhouse. After all, the Angels don’t tolerate any petty crime in their immediate sphere and generally endeavor to avoid scrutiny by the authorities.

The Hells Angels-as-neighborhood-watchdog theory may very well have stock – unless they happen to be having a shootout with the Vagos.

The Chino Valley shootout was not the first time the Hells Angels and Vagos warred on Arizona soil. On June 11, 2009, five members of the Arizona Nomads – a roving Hells Angels chapter with no official clubhouse – allegedly mixed it up with a pair of Vagos at Lazy Harry’s Sunshine Saloon in Bullhead City near the Colorado River. Two members of a Hells Angels affiliate club, the Desert Road Riders, were also implicated. It was described by DPS as the biggest “in a series of violent assaults inside several bars” in Bullhead City. Five months later, all seven HA-affiliated combatants were arrested for felony rioting.

The spike in biker hostilities in Bullhead City initially puzzled authorities, because members of the Vagos’ Tri-State chapter – based in the string of river towns where Arizona, California and Nevada meet – had been operating in northwest Arizona since at least 2000 with relatively little incident, according to Sgt. Ernie Severson of GITEM. “I ran the unit for Bullhead City and Lake Havasu City, and the two gangs mostly kept to themselves,” Severson says. “The Angels let the Vagos have Havasu. They didn’t really contest it.”



The Dirty Dozen ruled Arizona’s biker community from the late ’60s until its merger with the Hells Angels in 1997.

Ultimately, the uneasy peace collapsed. And the reason? Severson believes it was a matter of patches.

A quick primer on outlaw biker attire: The vests, or “cuts,” favored by most rank-and-file bikers reveal a deep cache of information about the wearer, via the patches affixed to the front and back of the garment. The front patches denote personal details like rank, exploits and chapter affiliation. The back patches, or “rockers,” cover the more organizational stuff. The top rocker

Case 1:20-cr-00078-MSC-CEB Document 208-4 Filed 06/29/20 Page 265 of 339 PageID #: 919

indicates the name of the club. The middle patch is the club's emblem. In the case of the Hells Angels, the famed, winged death-head; in the case of the Vagos, a muscle-bound caricature of the Norse god of mischief, Loki, set against a green field.

The bottom rocker is particularly critical for American outlaw bikers, and the key to the Bullhead City incidents, in Severson's opinion: It identifies the wearer's state of residence. But the "Arizona" rockers on the bottom of the cuts worn by the Arizona Hells Angels are more than simple identifiers – they're also an expression of status; they confer power and authority, and wearing them is historically a privilege that the most dominant outlaw motorcycle clubs reserve for themselves.

Mora, the one-time Dirty Dozen capo and current Arizona Hells Angel, says that he and his Dirty Dozen comrades would scour the streets and bars of Tucson in the early 1990s, looking for rival bike clubs sporting the "Arizona" rocker. Once they made contact, Mora would issue an ultimatum: "I told them to lose the rocker. If they refused, we'd cut it off their backs. If they obeyed, no problem. Let's have a beer."

For years, the Vagos in Bullhead City and other parts of Mohave County wore "California" rockers. That changed about two years ago, Severson says. "Then they started sporting Arizona rockers, and that's when the problems started. That's more than likely what precipitated the fight in Bullhead City." Concurrently, the number of Vagos operating in Arizona climbed sharply. Not just in Bullhead City and Mohave County, where Severson currently counts "15 or more." Also in Yavapai County. And in Phoenix.

It was clear to law enforcement that the Vagos – a rising MC with designs on Mexico and the Southwest – were making a push into Arizona. It seems likely that the Hells Angels noticed, too.

Page Break

The issue of Arizona rockers was potentially a contributing factor in the Chino Valley gun battle. So was the curious proximity of the Vagos house to Toth's two-story stucco dwelling. Outlaw bikers are sensitive to affronts. The Hells Angels could not have been pleased by the symbolic violation of their turf. Asked to estimate the odds that a full-patch Vagos biker would move within three doorsteps of the old Skull Valley clubhouse and not know it, one Hells Angels says, "No chance at all."

The upshot: Neither side came to Chino Valley on August 21 to brawl, necessarily. But a brawl – somewhere, sometime – was all but inevitable.

According to documents released by the Yavapai County Attorney's Office in September 2010, Vagos Tri-State vice president Aurelio Figueroa – who witnessed the shootout – had at least some inkling of the trouble to come. After the battle, he told a Sheriff's Office detective that he asked a group of Vagos from the Phoenix area not to attend the Chino Valley get-together, presumably to avoid a run-in with the Hells Angels, but that five of them came anyway.

Case 1:20-cr-00078-MSC-JEC Document 308-4 Filed 11/06/20 Page 26 of 33 PageID #: 920
On Friday night, the Vagos posted security details at the Diecks' house. After the shootout, authorities would confiscate a tidy arsenal of weaponry at the residence, including 10 handguns, one Norinco SKS rifle, two fighting knives and numerous boxes of ammunition.

Moreover, Diecks told authorities that for several months leading up to the shooting, a Hells Angels prospect would ride past his house and "[point] his fingers at him simulating a weapon," according to a news story that ran in the Chino Valley Review on September 15, 2010.

The volatile air-mixture of suspicion and tension almost certainly informed an incident Saturday morning when a group of three Hells Angels prospects – later identified as Scott, Bruce Schweigert and Robert Kittredge – crossed paths at a nearby Circle K with a pair of Vagos associates named Alfred Azevedo and Clay Messina. Yavapai County Superior Court documents show that Azevedo lived in Kingman at the time and was a "hang-around" – that is, a Vagos gadfly with aspirations of becoming a prospect.

Azevedo – whose version of the events figured prominently in a Sheriff's report – told investigators that one of the Hells Angels "approached him and asked if he was a Vagos." That was the extent of the encounter – a surveillance video provided to authorities confirms that no physical confrontation occurred – but it evidently rattled Azevedo and Messina to the extent that a phone call was made to the Diecks residence alerting the Vagos to the effect that "the Hells Angels were trying to get them," according to the report.

Evidently, the summons was taken to heart. Shortly after the phone call, a convoy of Vagos bikers left the Diecks residence and scrambled eastbound down Road 3 in Chino Valley toward the Circle K. Finding no Hells Angels, they continued westbound up Road 4, making a wide loop that would take them past the Hells Angels residence on their way back to the Vagos house.

And that's when MC mayhem broke loose. According to a report filed by Detective Zavos, a Vagos biker named Bob Blankenship – who held the rank of Sergeant-of-Arms for the Tri-State Vagos – was shot as he executed a U-turn in front of the old Hells Angels clubhouse. The Vagos returned fire, wounding Hells Angel biker Kevin Christensen in the abdomen. (None of the five injuries from the battle was life-threatening.) The outnumbered Angels retreated into the house, where the firefight continued for approximately 10 minutes.

The Yavapai County Attorney's case against the Hell Angels chugged along in appeals court until May, when a sensational bit of information emerged about one of the key witnesses in the shootout. Alfred Azevedo, the Vagos hang-around who summoned the cavalry after the Circle K incident, was at the time also a confidential informant for GIITEM. And a scorned wannabe Hells Angel to boot.

According to documents filed in Yavapai County Superior Court, Kingman-based GIITEM Detective John Morris started using Azevedo to spy on the Vagos in May 2010. As a "paid reliable informant," Azevedo had previously worked for law enforcement entities and was known to provide sound information about underworld dealings.

“[Azevedo] was hanging out at Bike Night quite a bit, which was a Wednesday night event in Kingman,” Morris told defense attorneys in an hour-long interview. “And he ended up running into one of the Vagos members that lived in Kingman, went to the guy’s shop the next day, and within, I don’t know, an hour... was invited to the international Vagos run in Parker. So that was pretty much how easy it was.” As Azevedo’s control officer, Morris was responsible for monitoring his activity and debriefing him. Consequently, the lawman was alarmed when word trickled up to Kingman about the gun battle in Chino Valley.

“I was worried about [Azevedo] being involved in the shooting,” Morris recalls. Upon hearing the news, he jumped in his car and high-tailed it to the scene of the crime, alerting the lead detective, Zavos, that he had an informant embedded in the Vagos.

Presumably to protect Azevedo’s confidential status, Zavos never disclosed the nature of the hang-around’s involvement with GIITEM during the initial grand jury evidentiary hearing in November. The facts only came to light in May after a court-ordered sheriff’s office report. By that time, Azevedo was no longer useful as an informant, having helped Morris execute a Vagos-related fraud case in Kingman. In other words, his cover was blown. “[The fraud case] pretty much let the cat out of the bag,” Morris says.

Citing ethical rules, both Yavapai County Attorney Dana Owens and defense counsel Gaxiola declined to comment on the Azevedo matter, but the presence of a GIITEM asset in the case does invite some second-guessing. In the wake of the shooting, law enforcement obviously sought to preserve their Vagos informant. Might that have skewed the case against the Hells Angels? And what about Azevedo’s motives? According to Morris, Azevedo tried to “hang out with the Hells Angels” in Kingman before courting the Vagos, but they “kept kind of just shunning him.” Was he bitter over the slight? Could he have lit the powder keg on Yuma Drive by misrepresenting the Circle K encounter?

As reflected in their police interviews, the Vagos maintain that the shootout was a premeditated event on the part of the Hells Angels. Justin Kaufman, a Vagos hang-around from Mesa who was driving his black Range Rover near the crime scene, told Sheriff’s Office investigators that the Angels had been planning the attack “for a while.”

All factors for a jury to weigh in trial, if a trial ever happens. As this issue went to press, the case was still mired in appeal and pre-trial litigation. A joint-motion to dismiss the charges against the Hells Angels was pending.

Whatever the outcome in the Chino Valley case, Arizona will be left with the same uncertain outlaw-biker predicament: One large, entrenched biker brand, very well known to the public, and a smaller but fast-growing challenger, significantly less well known. And neither looks to back down.

Case 1:20-cr-00078-00533-ESC Document 90-84 Filed 11/06/20 Page 26 of 38
922
“We’ve seen a definite upswing in biker numbers for all clubs,” Sgt. Robbie Milam of GHD’s Phoenix office says, citing the popularity of the biker-themed cable show The Sons of Anarchy as one explanation. “The Vagos got a foothold in Mohave County and now they’re in Phoenix, and that indicates they’re trying to make inroads.”

How will the Hells Angels respond? What will happen the next time a group of guys wearing the death-head patch catches sight of a sea of muscular-Loki-green, or vice versa? With Valley-area chapters and clubhouses in Phoenix, Mesa and Cave Creek, the Angels maintain they’re not the belligerent party. Officially, they say the Arizona rocker is a moot issue. “We don’t enforce anything like that,” Koepke says. “That’s the old mentality. People are free to wear whatever patch they like.”

Law enforcement confirms that the Hells Angels appear to have loosened up their bottom rocker policy. Milam reports that members of the Mongols Motorcycle Club – another traditional Hells Angels enemy – have been sighted wearing the Arizona rocker in Mesa, and that two Hells Angels-affiliated clubs, the Hooligans and the Sons of Hell, recently began wearing the Arizona rocker with the Hells Angels’ blessing.

“That occurred in April, so we’ll see if that’s a change in philosophy on the Angels’ part,” Milam says.

Still, Milam – whose declined to estimate the number of Vagos operating in greater Phoenix, other than to say “significant” – predicts that Chino Valley is just the tip of the iceberg: “There’s still gonna be a turf battle regardless of who wears what.”

For the Arizona Hells Angels, the changing outlaw-biker landscape presents an age-old dilemma for powerful men and alpha-dominant organizations, of dynasties stretching from ancient Rome to Michael Jordan’s Chicago Bulls – i.e., the challenge of holding the center. Of staying on top.

How the Hells Angels choose to handle the dilemma may well determine how close the turf battle comes to the Valley’s doorstep. “It’s a tough predicament,” one longtime member concedes. “We’re the only ones with anything to lose in this whole shebang.”

Related Posts



U.S.

OCTOBER 26, 2011 / 8:45 AM / 9 YEARS AGO

Worst California biker feud in decade erupted at Starbucks

Jason Kandel



LOS ANGELES (Reuters) - A turf war between the Hells Angels and a rival motorcycle gang that erupted outside a California Starbucks shop last year has left several men dead, wounded or missing in three states, stirring fears of more bloodshed.

Cesar Villagrana, 36, of Gilroy, California is seen in this booking photograph released to Reuters on October 26, 2011. Villagrana was with Jeffrey "Jethro" Pettigrew, leader of the Hells Angels chapter in San Jose, California, when a rival gang member shot Pettigrew to death on September 23 2011 in a casino in Sparks, Nevada. REUTERS/Washoe County Sheriff's Office

Ranked by law enforcement as the most severe clash of two California-based biker groups in nearly a decade, the spate of violence turned deadly last month when it spilled into Nevada with a brawl and shooting among members of the Hells Angels and Vagos motorcycle clubs.

The president of the Hells Angels' San Jose, California, chapter, Jeffrey "Jethro" Pettigrew, 51, was shot to death, and one Vagos member was wounded in the melee at John Ascuaga's Nugget hotel and casino in Sparks. A second Vagos member was wounded in a drive-by shooting the next day at the site of a nearby motorcycle rally in town.

The Pettigrew killing — coming 11 months after a gunfight between the two gangs in Arizona that left five people wounded — in turn sparked tensions within the Hells Angels' ranks that led to yet another slaying in California, authorities say.

"There have been concerns about this rivalry for some time," said Graham Barlowe, resident agent in charge of the Sacramento office of the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives.

The last California biker feud of similar proportions grew out of a 2002 casino riot in Laughlin, Nevada, between the Hells Angels and another group known as the Mongols, Barlowe said. At least three bikers died as a result of that conflict.

ADVERTISEMENT

DEAD OR ALIVE

The latest casualty of the Hells Angels' recent battle against Vagos actually was inflicted by one of their own.

At Pettigrew's funeral in California weeks after he was slain in Nevada, his close friend and sergeant-at-arms of the San Jose chapter, Steven Tausan, 52, was shot and killed by a fellow Hells Angel in an apparent quarrel among club members.

A police source familiar with the investigation said Tausan and others confronted the accused gunman, Steve Ruiz, over his perceived failure to have protected Pettigrew during the Nugget casino brawl, prompting Ruiz to pull a gun on Tausan.

A group of bikers then pounced on Ruiz as thousands of mourners streamed out of the cemetery, preventing police officers at the funeral from making an arrest, San Jose police spokesman Jose Garcia said.

In the end, it was unclear whether the bikers who descended on Ruiz did so to subdue him, beat him or help him escape, but witnesses said he was whisked away in a car, Garcia said.

Suspecting that Ruiz may have been killed at the scene and his body dumped into Pettigrew's grave, police later obtained a search warrant to dig up the burial site, but they found no trace of Ruiz, Garcia said.

Last week, San Jose police received a tip that Ruiz was alive and hiding out in the northern California city of Stockton, but he was believed to have slipped away after investigators searched a home there to no avail on Saturday.

Garcia said authorities now believe Ruiz is on the run with a current or former girlfriend, noting that he has family and associates in Arizona and New York.

The recent bloodshed can all be traced to last year's push by Vagos, founded in the 1960s in a Southern California desert community, into the northern coastal town of Santa Cruz, long claimed as Hells Angels territory, police said.

CAFFEINE FOR BIKERS

Tensions boiled over in January 2010, when members of the rival gangs, some wielding ball-peen hammers, fought outside a Santa Cruz Starbucks before scattering as police arrived.

"It was all about who would be allowed to hang out at the Starbucks downtown," Santa Cruz Deputy Police Chief Steve Clark said. "The Vagos brazenly came in and tried to cement their presence. It was a pretty strong play on their part to establish themselves as the premiere club."

Ernesto Manuel Gonzalez is pictured in this September 30, 2011 booking photograph released by the San Francisco Poli...

He added: “Only in Santa Cruz would you have biker wars over who’s going to control pumpkin spice lattes.”

Seven months after the Starbucks ambush, violence between the two groups flared again in a gunfight in August 2010 that left five people wounded and led to 27 arrests in the northern Arizona town of Chino Valley.

The U.S. Justice Department has classified both the Hells Angels and Vagos as outlaw gangs deeply involved in drug and weapons trafficking, as well as extortion, money laundering, theft and various violent crimes.

The Hells Angels, by far the larger and better known of the two, was founded in 1948 in Fontana, California, and has since established over 230 chapters with an estimated 2,000 to 2,500 members worldwide, the government says.

The organization denies its involvement in criminal activity and argues the club should not be blamed for the illegal actions of individual bikers.

Members insist the overwhelming majority are law-abiding citizens who share a love of powerful motorcycles, especially Harley-Davidsons and choppers, and point to their prominent role in certain charity events as evidence that their outlaw reputation is exaggerated by the media.

Karen Snell, a San Francisco-based lawyer who has represented a number of Hells Angels members, said Pettigrew and Tausan, for example, were “family guys.”

“They made honest livings. They worked hard and were responsible,” she told Reuters.

Police have arrested two people in connection with last month’s casino brawl, including Ernesto Manuel Gonzalez, 53, a Vagos member suspected in Pettigrew’s slaying.

Editing by Steve Gorman and Greg McCune

Our Standards: The Thomson Reuters Trust Principles.

MORE FROM REUTERS

NEWS

Video of Hells Angels, Vagos fight shown

By [LEAH DEANDA](#) |

PUBLISHED: December 18, 2014 at 12:00 a.m. | UPDATED: August 23, 2018 at 12:00 a.m.

LAKEPORT >> Jurors were given their first viewing of a series of video clips depicting the altercation between Vagos and Hells Angels motorcycle club members at Konocti Vista Casino, the incident that brought about the trial.

District Attorney Deputy Art Grothe walked the courtroom through all 27 clips originally collected by Sheriff Frank Rivero from the casino's surveillance footage following the incident. Lake County Sheriff's Office (LCSO) then-detective and current Sgt. John Gregor, who led the investigation of the case, narrated the happenings of each clip with Grothe.

The fight took place at approximately 1:22 p.m. on June 4, 2011, but the first handful of clips showed events from as early as 10:30 a.m. and focused on the Hells Angels' booth at the tattoo convention in the Konocti Vista Casino (KVC) banquet room. A total of seven clips preceded Vagos members Michael Burns'

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

930

All three defendants — John Johnson, Nicolas Carrillo and Timothy Bianchi — could be seen milling around the booth in early footage and there certainly were some clips lasting as long as 5 minutes or more appearing to lack relevant activity. Grothe intermittently asked Gregor questions, including a few about the significance of the number 81 and the colors red and white, which are associated with the Hells Angels Motorcycle Club (HAMC).

David Dabbs, another HAMC member involved in the altercation, was also introduced to the jury by name for the first time. Dabbs has been at large since a warrant for his arrest was issued in 2011 and his name has scarcely been mentioned in court proceedings.

Nearing the time of the altercation, Grothe pointed out that Bianchi and Dabbs had both taken off either their long-sleeved shirt or sweatshirt by 1 p.m., still 16 minutes before Burns made his first alleged appearance at the casino. Grothe later noted the rainy weather, as if to infer the removed the articles of clothing in order to prepare for a tussle.

Burns was shown entering the casino at 1:16 p.m. and heading straight for the door of the banquet room. At 1:19 p.m., Christopher Perkins, another Vagos member involved in the fight, entered the banquet room.

Perkins and Burns are seen casually strolling through the room, perusing the booths. Burns and Dabbs are shown passing by each other at least once, if not twice, but don't interact.

At 1:21, Dabbs, Bianchi, Carrillo and Johnson are shown together at the Hells Angels booth.

Suddenly, just before 1:22 p.m., Burns and Perkins walk back into the main room of the casino, followed by Bianchi and Dabbs, and all four parties exit double doors into the KVC foyer.

With the men closely grouped together, it's difficult to tell precisely from the video what happened, except that almost immediately after entering the foyer, Bianchi threw the first punch.

While the fight is under way, Johnson appears to casually walk into the main casino room with a hand in his pocket. Upon seeing the fight and with Carrillo following, both HAMC members join the fight.

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)

931

Being separated from the tangle by two security guards, Perkins is seen struggling to get back in and at one point his hand appears to make contact with a guards' neck.

Security guards also come in with a mop cart, supposedly to mop up blood, as Burns makes it to his feet. His face is streaked with blood but he is otherwise under enough control to stand and steadily walk out of the casino.

Perkins and Burns are shown leaving the casino just as LCSO Sgt. Gary Frace arrives. Meanwhile, Bianchi, Johnson, Carrillo and Dabbs make it back to their booth and other members begin packing up their support gear.

In the last hour of the trial day, attorney Jai Gohel, representing Bianchi, began his cross-examination of Gregor.

At Gohel's prompting, Gregor said he had been aware of the incident on May 14, 2011 when Rivero attempted to block Hells Angels members' entry into Lake County when he began participating in the investigation of the KVC fight.

"As far as I knew, they weren't related to each other at all," Gregor said of the two incidents.

Asked if he ever investigated how the Hells Angels were invited to the KVC tattoo convention, Gregor said he "never looked into that." He also affirmed a LCSO deputy had said the casino didn't want to give up their surveillance video clips to the office, although Rivero was able to quickly get a hold of them.

Asked if he ever went back to KVC to request all the videos from the time of the fight be preserved, Gregor denied doing so.

"So whatever you got from Sheriff Rivero was what you worked with?" Gohel asked.

"Yes," Gregor replied.

Gregor also said he didn't know if Burns had made an appearance at the casino before 1:16 p.m.

With the day ending, the cross-examination of Gregor was continued and will be heard this morning at 9 a.m. Rivero has also been subpoenaed to appear today as a witness.

This website stores data such as cookies to enable important site functionality including analytics, targeting, and personalization. By remaining on this web site you indicate your consent. [Data Storage Policy](#)





(<https://www.westhawaii.com>)


Hawaii News (<https://www.westhawaii.com/category/hawaii-news/>)

Man gets 5 years in Keaukaha stabbing


By JOHN BURNETT Hawaii Tribune-Herald | Monday, October 19, 2015, 6:48 p.m.

Share this story 

 (<https://twitter.com/intent/tweet?text=https://www.westhawaii.com/2015/10/19/hawaii-news/man-gets-5-years-in-keaukaha-stabbing/>)

 (<mailto:?subject=Man gets 5 years in Keaukaha stabbing&body=https://www.westhawaii.com/2015/10/19/hawaii-news/man-gets-5-years-in-keaukaha-stabbing/>)



 Our Privacy Policy has been updated. By continuing to use our site, you are acknowledging and agreeing to our updated Privacy Policy (<http://www.oahupublications.com/terms-of-service/>) and our Terms of Service (<http://www.oahupublications.com/terms-of-service>).



A 47-year-old Ocean View man described by a prosecutor as “the leader of the Hells Angels local club” was sentenced Friday to five years in prison for a stabbing last year at a popular beach in Keaukaha.

ADVERTISING

A 47-year-old Ocean View man described by a prosecutor as “the leader of the Hells Angels local club” was sentenced Friday to five years in prison for a stabbing last year at a popular beach in Keaukaha.

Hilo Circuit Judge Greg Nakamura also ordered Paul Gibson to make restitution of \$5,629.49 to reimburse medical expenses incurred by David Coombes, who was stabbed 12 times during the May 10, 2014, altercation on a side road close to James Kealoha Beach Park, better known as “4-Mile.”

In a deal with prosecutors, Coombes pleaded no contest Aug. 13 to second-degree assault and first-degree terroristic threatening. He originally was charged with attempted second-degree murder, two counts of terroristic threatening, five firearms offenses, resisting an order to stop and failure to provide a DNA sample to law enforcement.

Deputy Prosecutor Joseph Lee said the case came down to “power and perks.” He said Gibson, who was then a prospect for the Oahu Hells Angels’ chapter, took it upon himself to tell Coombes, then 41, and his wife, Alicia Jeremiah-Coombes, to leave a memorial gathering for a deceased biker at the beach.

“The reason that the Coombes were not welcome ... is because of the defendant’s attitude toward David Coombes,” Lee told the judge. “David Coombes is a former member of the Vagos Motorcycle Club on the mainland and the defendant knew this. ... The defendant decided he was going to show the power that he had, or that he believed he had, and force the Coombes leave.”

Gibson’s attorney, Michael Zola, acknowledged his client told the Coombeses to leave, but said the altercation was not prompted by a turf war between the Vagos and the Hells Angels.

By clicking, you agree to our updated Privacy Policy (<http://www.oahupublications.com/terms-of-service/>) and our Terms of Service (<http://www.oahupublications.com/terms-of-service/>).

"We're looking at a mutual affray gone wrong ... and Mr. Gibson has responsibility in his role in that," Zola told the judge. "And what happened after that is that Mr. Coombes, who is a trained fighter at BJ Penn's gym and is a much heavier guy, got the better of him and he got him on the ground. ... The underlying premise here is that Mr. Gibson was being choked out and decided, whether rightly or wrongly, that he needed to pull out his pocketknife and stop (Coombes) from killing him."

The couple, who maintain the attack was unprovoked, said Gibson pointed a handgun at Alicia Jeremiah-Coombes. A loaded black .22-caliber semiautomatic pistol was found later in some bushes along Apapane Road in Keaukaha, but Gibson denies having anything to do with the weapon.

"The defendant insists that that firearm was planted by Alicia Coombes," Lee said. "It is interesting to point out that while the defendant denies possessing or touching that firearm, his DNA, the defendant's DNA was found on the firearm. ... Nowhere on that firearm was the DNA of Alicia Coombes found on that firearm."

Gibson, who since has become a full-patch member of Hells Angels, spoke briefly. Turning to the Coombeses, he said, "I've had a lot of time to consider ... the effect that it had on the Coombes and the negative impact it had on them and my own family, and I do accept responsibility for my part in this confrontation."

"Is there anything else you'd like to say?" asked Nakamura.

"No," Gibson replied.

Zola asked the judge to consider probation with intermittent jail or to delay Gibson's imprisonment so he can finish contracted work as a plumber "and provide for his family."

Nakamura ordered immediate incarceration, noting "the seriousness of the offenses," and Gibson's wife, Christie, wept openly.

"You do have a prior criminal history," the judge said. "The court believes that prison terms are appropriate for the purpose of punishment and the deterrence of others. And I think these considerations would override any concerns that one would have for provision for your family."

Alicia Jeremiah-Coombes also shed tears after the hearing.

"This is sad. Everybody's affected by it. Everybody. Not only me and my husband, but also them. But I'm glad the judge saw what needed to be done," she said.

ADVERTISING

Our Privacy Policy has been updated. By continuing to use our site, you are acknowledging and agreeing to our updated Privacy Policy (<http://www.oahupublications.com/terms-of-service/>) and our Terms of Service (<http://www.oahupublications.com/terms-of-service>).

“Hopefully, he’ll go in a different direction and not hurt somebody else,” David Coombes said.

Email John Burnett at jburnett@hawaiiitribune-herald.com.

SPONSORED CONTENT (HTTPS://WWW.VERUSET.COM/DSP-VISIT/CF8890FD-053B-4F9B-AA19-52A1318D3020?OTY=MQUTSWE3EFPEGYVHR7_MT1VK8LEZC0C2WTM0FCW-VQ_BBI0SOBL0ZYQAFVLEJRFOHFAXLV-5G-WA7RSBDG9VQIWPFZ2X1I7PLXG1VJCY8NDETLXETFGLOWTQM-IPFOP5A4ZRHEVMBU1YE4IT4XWC9JMRU-O9U670PYCNAASIZBUUELAEGR-QQEF3TGZL-_0W5A67RBUBX0K0E92XBVQ2LGVYYIW49DCEG08DYBC14CZ3FXWTFIC43M3QKQYISM YJCHKPVJNMEZHSHK_V5VTUJZM0J5PNRG3ZY8ZR6LM6PHF3B-87TAKGMCXSAPDDMLHLKEG6ORCXXXUPRS37_TF3LZAU8FMVTJN86DGSXHNJYCLD21 LMLFZYGY16O2PGF7CTS_JFJK0GEOYHHCVWY0VJSP2OS-TVB5HFAP_MT5MB2A6FIKGO4B5GXGI6VMUE7ENNAWWQHGX_SOXIWUV5TGCRZKGO ONRIAWISS27YKMXM78YAPHQTJXNLLQST5K4PWQ66L0QR4D4AWXBOQBWMGIYWP FBBYS22HXSL6G-Z4EQ4GOYIRFRRU1BYAH5PLUABGV1S55M2LAXV0CD7PAGLQVKD-5MVH2FQM-ZLN6QK16Q4M8OYD70UGGOE2UXL1WNADJPUV)



FDA-Approved Keto Pill That Melts 27LBS Belly Fat Each Week! (https://www.veruset.com/dsp-visit/cf8890fd-053b-4f9b-aa19-52a1318d3020?oty=mqutSWE3EFPEgYvhr7_mt1vK8LEzc0C2WtM0fcW-vQ_Bbi0SobL0ZYqafvlejrFOHfaXIV-5g-WA7rsBDg9vqiWPFz2x1i7PLXg1vJCY8ndeTlxeTFgl0WTQM-IpFop5A4zRHeVMBU1ye4It4XWC9jMRu-O9u670PycnaaSizBUueLAEgr-Qqef3tgZL-_0w5a67RBUBx0K0e92XBvq2lGvyYIW49DceG08dyBe14cZ3FXWTFic43m3qKqYiSMYJcHkPvjNMeZHSHK_V5vtujZm0j5pnRG3zy8zr6lm6pHF3B-87takGmcXSAPDDmlhIkE6oRCxXsuprs37_tf3lZAU8fMVTJN86dgSxHnjYcLd21lmLFzygY16o2pgf7cTS_JFJK0GeOyhhCVWY0vJsp2Os-tvB5hFAP_mt5mB2a6flkGo4b5GXGI6vMUe7ennAwWqHGX_soxIwUv5TGcrzkGOonrIAwiSs27YkMxM78yaPHQtJXnLLqST5k4pWq66l0qR4D4AWXBoQbwMgiYwpFBbys22Hxsl6G-z4eQ4GOYIRFrru1ByaH5plUAbGy1S55m2LaXV0CD7pAgLOykD-5mVh2fqM-zLn6OK16Q4M8oyd70ugGOe2UxL1wNADJpuV)

https://www.veruset.com/dsp-visit/cf8890fd-053b-4f9b-aa19-52a1318d3020?oty=mqutSWE3EFPEgYvhr7_mt1vK8LEzc0C2WtM0fcW-vQ_Bbi0SobL0ZYqafvlejrFOHfaXIV-5g-WA7rsBDg9vqiWPFz2x1i7PLXg1vJCY8ndeTlxeTFgl0WTQM-IpFop5A4zRHeVMBU1ye4It4XWC9jMRu-O9u670PycnaaSizBUueLAEgr-Qqef3tgZL-_0w5a67RBUBx0K0e92XBvq2lGvyYIW49DceG08dyBe14cZ3FXWTFic43m3qKqYiSMYJcHkPvjNMeZHSHK_V5vtujZm0j5pnRG3zy8zr6lm6pHF3B-87takGmcXSAPDDmlhIkE6oRCxXsuprs37_tf3lZAU8fMVTJN86dgSxHnjYcLd21lmLFzygY16o2pgf7cTS_JFJK0GeOyhhCVWY0vJsp2Os-tvB5hFAP_mt5mB2a6flkGo4b5GXGI6vMUe7ennAwWqHGX_soxIwUv5TGcrzkGOonrIAwiSs27YkMxM78yaPHQtJXnLLqST5k4pWq66l0qR4D4AWXBoQbwMgiYwpFBbys22Hxsl6G-z4eQ4GOYIRFrru1ByaH5plUAbGy1S55m2LaXV0CD7pAgLOykD-5mVh2fqM-zLn6OK16Q4M8oyd70ugGOe2UxL1wNADJpuV

Our Privacy Policy has been updated. By continuing to use our site, you are acknowledging and agreeing to our updated Privacy Policy (<http://www.oahupublications.com/terms-of-service/>) and our Terms of Service (<http://www.oahupublications.com/terms-of-service/>).

Carson City man arrested in Yuba City shooting

Nevada Appeal staff report

Francisco “Cisco” Fernandez, 34, was arrested Wednesday around 8 p.m. after deputies initiated a traffic stop near the 4600 block of Highway 50. Fernandez was arrested on suspicion of felony fugitive from justice after deputies discovered the man had a warrant for his arrest in Yuba City, Calif., for attempted murder.

The shooting happened Sept. 14 at 8:21 p.m. after the Yuba City Police Department responded to reports of shots fired. There, officers found an adult male motorcyclist lying on the road, officials with Yuba City PD said.

Last week The Carson City Sheriff's Office and Yuba City Police Department executed search warrants on two residences and a business in Carson City and Yuba City, Calif., Sept. 25 to attempt to locate evidence in a drive-by shooting that occurred in Yuba City.

The shooting may possibly be linked to the Hells Angels motorcycle gang.

Sheriff Ken Furlong said they had obtained the evidence they were looking for during the warrant execution, however declined to comment on what those items were. At the time of the execution, no arrest warrant had been filed for Fernandez.

Fernandez owns property both in Yuba City and Carson City as well as a business in Carson. The search warrant on Sept. 25 was executed at the Tanglewood Village apartments and the Highway 50 Nautical Motorcycles shop.

Bail for Fernandez was set at \$500,000.

BREAKING NEWS Watch Live: Golden State Killer Joseph DeAngelo pleads 'guilty' to rapes, murders [Read More »](#)

SACRAMENTO

Rival bike clubs start fight at Sac Convention Center

Three people were arrested for assault.

Three people were arrested after a fight broke out at the Sacramento Convention Center on Saturday, Jan. 17, 2015.

Author: KXTV Staff
Published: 5:50 PM PST January 17, 2015
Updated: 5:50 PM PST January 17, 2015



A fight broke out at the Sacramento Convention Center between two rival motorcycle clubs Saturday afternoon.

Sacramento police said members of the Hells Angels and Vagos clubs got into a fist fight during the Easy Rider Motorcycle show. At some point during the fight a loaded gun fell to the ground, but no shots were fired.

When officers arrived at the scene, they used pepper spray to subdue the subjects.
Three people were arrested for assault.

Exhibit 19

BIKER WAR ERUPTS IN ILLINOIS

By **Jerry Thomas, Tribune Staff Writer**
CHICAGO TRIBUNE

NOVEMBER 20, 1994 | ROCKFORD

Bob Long was standing behind the counter of his auto-parts shop on Broadway, preparing to open for business, when he heard a "bang, bang, bang" from the motorcycle shop next door.

At first he dismissed the noise, thinking it was just LaMont Mathias, his buddy of 15 years, getting an early start on the Harley Davidson bikes he repaired and rebuilt.

Two hours later, just before lunchtime, Long discovered the noise he had heard that morning was gunfire that killed his 47-year-old "no nonsense" friend-leader, according to authorities, of the Hell's Henchmen motorcycle gang.

Though Rockford has been home to the Henchmen for more than a decade, this working-class city has remained relatively quiet and safe. But Mathias' June 28 violent death signaled that something had gone awry in the underground world of motorcycle gangs.

According to authorities in Rockford and Chicago, a war has broken out in Illinois between the Chicago-based Outlaws and the California-based Hell's Angels, which recently merged with the Henchmen.

The increased violence comes as police resources have shrunk and authorities across the nation have shifted their focus to street gangs. As a result, motorcycle gangs have become more sophisticated and have expanded their markets.

"They are similar in structure and criminal activity to the Mafia, but their lifestyle is around the motorcycle," said Detective Michael Vaughn, a gang specialist for the Los Angeles Police Department.

Authorities say the Angels—a gang of predominantly white, blue-collar, middle-aged men—took over the Henchmen here, which also has chapters in Chicago and South Bend, Ind., because the Angels wanted to get a foothold in the large and lucrative Chicago-area drug trade.

The Angels also are heavily involved in murder-for-hire schemes, prostitution, car thefts and the distribution of illegal guns, authorities contend.

The 44-year-old Hell's Angels are the nation's largest motorcycle gang, with several thousand members in 94 chapters worldwide. They specialize in the distribution of chemical drugs, such as methamphetamine, according to Vaughn.

Since the so-called "designer" drugs are more popular with young whites, authorities said, the Angels plan to target the suburbs and pockets of the city where there are large numbers of whites. Those areas would not overlap with the drug market served by black and Hispanic gangs, authorities said.

But the Angels are treading onto the territory of the Outlaws, the dominant motorcycle gang in the Midwest.

"It has always been known that the Outlaws kept the Hell's Angels outside Chicago," said Richard Obartuch, a gang crime specialist for the Chicago Police Department. "But (Chicago) is like the last hurdle they have to overcome to make a statement.

"(The Angels) want to be top dog, and that is all part of that mentality. And the Outlaws say, 'We are just as bad as you. And if you come in, well and good, but you will have to pay a tremendous price.' "

The Outlaws made it clear with Mathias' death that the Angels are not welcome in Illinois, law enforcement officials said.

Nevertheless, more than 300 Angels rolled into Rockford last summer, displaying their colors on their chromed, antique bikes to attend Mathias' funeral and to posthumously induct him into the Hell's Angels.

That made the Outlaws even angrier.

In October, Roger Fiebrantz, Mathias' successor as head of the Henchmen, was seriously injured when an explosive device went off in his truck parked beside his trailer home. Fiebrantz remains in the intensive care unit of a Rockford hospital.

On Oct. 7, Mike Coyne, the acting president of the Henchmen, found a bomb beneath his car that later exploded. Later that day, a car exploded outside the Henchmen's clubhouse in Chicago. No one was injured in either bombing.

"Obviously, they have turned up the heat again another notch," Obartuch said.

In recent weeks, law enforcement officials from Rockford and Chicago and Winnebago and Cook Counties, as well as the Illinois State Police, the FBI and the U.S. Bureau of Alcohol, Tobacco and Firearms have been investigating the bombings and devising a plan to prevent more violence.

"The Hell's Angels, with their national identity and pride, will not permit anything like (the bombings) to go unanswered," Obartuch said. "They can't. They will lose total face (respect). You can expect continuing incidents, and it will probably escalate. Neither side will back down."

The Hell's Angels and the Outlaws have a history of bloody battles.

In September, a clash between the Angels and the Outlaws at a Lancaster, N.Y., drag race erupted into gunfire and knife fights. Each gang suffered a casualty.

The last big showdown was the "July 4th Massacre" in 1979, when the Hell's Angels stormed into a Charlotte, N.C., clubhouse and gunned down five Outlaws. Authorities believe the shooting was in retaliation for the killings a year earlier of seven Hell's Angels in a Montreal bar.

Later that year, 32 Hell's Angels, including their leader, Ralph Barger, were named in a 25-count federal indictment in California, which included charges of fraud and murder.

After Barger was convicted and sentenced to prison, the Hell's Angels slowly began to disappear from the American landscape.

But as it turned out, they didn't disband; they simply transformed themselves. The big clubs went international, and some members traded greasy jeans for business suits.

The Outlaws gang, which was organized in Chicago in 1962 and grew to a few thousand members, mostly in the Midwest and the South, was able to co-exist with the Henchmen with little violence before the Angels arrived, authorities said.

That is why Mathias' killing was such a shock.

Long said it is hard for him to believe that Mathias, a divorced father of three who once was a foreman at the nearby Chrysler plant, flirted with the wrong side of the law.

"I will never forget that day," Long said, referring to the shooting. "I felt so sad for his girlfriend. She cried so hard and so long her face was swollen.

"And you know what's so funny about that? No one saw anything."

Corrections

Additional material published Nov. 21, 1994: Corrections and clarifications. A story Sunday about recent violence between two motorcycle gangs contained the wrong dates for the car bombings in Rockford and Chicago, which occurred on Nov. 7. The Tribune regrets the error.

SUMMARY OF EVENT:

On March 14-15, 2009, ATF undercover agents and confidential sources met with Members of the OUTLAWS MOTORCYCLE CLUB (OUTLAWS MC) from North Carolina, South Carolina and Virginia. During this meeting undercover agents attended the Regional Bosses meeting, which took place in Hopewell, Virginia. Additionally, undercover agents and confidential sources were present when Members of the OUTLAWS MC planned and carried out an assault on Members of the DESPERADOS MC, a HELLS ANGELS MC affiliate club. This assault took place in Petersburg, Virginia. Several Members of the OUTLAWS MC came armed with firearms to commit this assault.

NARRATIVE:

1. On March 11, 2009, ATF Special Agent (SA) Jeff Grabman, while working in an undercover capacity, was contacted by Les WERTH, OUTLAWS MC COPPER REGION PRESIDENT. During this telephone conversation, WERTH told SA Grabman that he (WERTH) and approximately 5 other OUTLAWS MC Members from North and South Carolina would be coming to the Richmond, Virginia area on Saturday, March 14, 2009. WERTH told SA Grabman that they had business that they had to discuss.
2. Shortly after this conversation, SA Grabman contacted Mark FIEL, AKA SNUFF, MANASSAS/Front ROYAL, VIRGINIA OUTLAWS MC PRESIDENT by telephone. During this conversation, SA Grabman informed FIEL that WERTH had contacted him (SA Grabman) and that WERTH and others were coming to the Richmond area on Saturday. FIEL stated that he already knew about the planned meeting and would see SA Grabman at his (SA Grabman's) residence on Saturday. SA Grabman had a later conversation with FIEL on March 12, 2009, during which FIEL told SA Grabman that WERTH and the other OUTLAW MC Members were meeting in Richmond to conduct the Regional Bosses meeting, where WERTH would discuss everything that was talked about at the National meeting held in Daytona, Florida during the recent March bike week. FIEL added that these members were also going to be in Richmond to show support for the Richmond chapter. FIEL also told SA Grabman that he (FIEL) had spoken to Charles LOVE, AKA REBAR, PRESIDENT of the RICHMOND, VIRGINIA Chapter of the PAGAN's MC (PMC) and told LOVE that several Members of the OUTLAWS MC from out of state would be in the Richmond area on Saturday.
3. On March 13-14, SA Grabman was contacted several times by LOVE by telephone. During these conversations, LOVE stated that he too had PMC Members from outside the Richmond area in town, as a show of support and to assault members of the HAMC and their affiliate clubs if they came into the Southern Star bar, located in Colonial Heights, Virginia. LOVE asked SA Grabman to meet with himself and other PMC Members when the OUTLAWS MC Members from out of state came into town.
4. On March 14, 2009, ATF SA's Grabman, Dan Ozbolt and Thomas Anderson, along with two ATF Confidential Sources, met with the following OUTLAWS MC Members:
 - Les WERTH – COPPER REGION PRESIDENT
 - Mike MARIACA, AKA M & M – PRESIDENT of the ROCK HILL, SC CHAPTER
 - Mike SMITH – PRESIDENT of the LEXINGTON, NC CHAPTER
 - Harry MCCALL – VICE PRESIDENT CHARLOTTE, NC CHAPTER
 - Christopher TIMBERS, AKA ALIBI – MEMBER MANASSAS, VIRGINIA CHAPTER
 - Lyle BEATTY, AKA BUTCHY- MEMBER MANASSAS, VIRGINIA CHAPTER
 - William DAVEY, AKA REBEL – MEMBER ASHVILLE, NC CHAPTER
5. During this meeting at the undercover residence in Hopewell, Virginia, WERTH stated that he wanted SA Grabman to locate a hotel where they could conduct the Regional Meeting. It was made apparent that the OUTLAWS were concerned about locations being bugged by law enforcement and stated that they wanted to do it at another location. It was later told to undercover agents that Bosses Meetings are always held in a

6. While at the undercover residence, the Members of the OUTLAWS that were present stated that they had come to Richmond to conduct this meeting, in part because they wanted to take the opportunity to come to Virginia to find and assault Members and associates of the HELLS ANGELS MC (HAMC) and their support clubs. Undercover agents were asked to describe the membership and strength of the HAMC and their support clubs, to include where the local establishments were that they frequent. The undercover agents were told that following the Regional Meeting, Members of the OUTLAWS were going to be going out in the Richmond area to find and assault these HAMC Members and support club members. Additional details of this conversation are contained on the audio/video CD recording made at the undercover residence, which has been placed into ATF Evidence as Item #E-088.
7. The regional Meeting was held in room 327 at the Fairfield Inn, located in Hopewell, Virginia. During the course of this meeting, which WERTH ran, issues that were presented at the National meeting were discussed, to include:
 - The OUTLAWS currently have 526 Members, and 50 new Members since December of 2008.
 - Rochester, IL has a new Black Piston Chapter
 - Mt. Vernon, IL has a new Black Piston Chapter
 - "BOBBY" from Peoria, IL is out of the club
 - "ROAD HOG" from Indiana quit the club
 - Member need to write more letters to Members in Prison, so they feel needed and do not cooperate with law enforcement
 - Absolutely no pictures on any websites of Outlaw members
 - The OUTLAWS in Orlando have a new clubhouse
 - "POCKETS" from Pensacola, FL was arrested by the "Feds" for a fight
 - New OUTLAWS Prospect Chapter in Cleveland, TN
 - The OUTLAWS are not going to attend the National NCOM meeting this year
 - The OUTLAWS now have 89 Chapters, in 1992 they only had 27 Chapters
 - The Wilkesburg, PA Chapter of the OUTLAWS was raided approximately a week ago by the "Feds".
 - The New York NIGHT RIDERS MC has patched over to become HELLS ANGELS MC Members.
 - "RANDY" from Columbus, OH Chapter quit the club
 - The ANIMALS MC from Pennsylvania are now an official OUTLAWS Affiliate Club
 - Need to be cautious around the black WHEELS OF SOUL MC Members, some OUTLAWS ok with them others are not
 - If a Members fails to defend his patch or is "punked out" while wearing his patch, he will have his 1%er Diamond cut off his colors because he embarrassed the club
 - "DOMINICH" will be "off-paper" soon.
 - The HIGHLAND CLAN MC, which is an OUTLAW support club from Wisconsin/Northern Michigan, opened a new chapter in Ohio.
 - BLACK HAWKS MC in Martinsburg, IN is an official OUTLAWS support club
 - MINYUNS MC in Anderson, IN is now an official OUTLAWS support club
 - As of now, the OUTLAWS are not going to the "SMOKEOUT" at the Rockingham Drag Strip on May 15, 2009
 - "SIR RICH" from Oklahoma is out of the club
 - "ED" from Ardmore, OK is out bad from the club
 - OUTLAWS LLC dues this year are \$425.00, \$42.50 per region
 - "SKEETER" in CT is out of the club
 - NH Chapter has lost their clubhouse, "HO JO" will now be the point of contact for anyone needing anything in NH
 - "LARRY MAC" is going to CANCUN, MX to talk to people there about opening a chapter

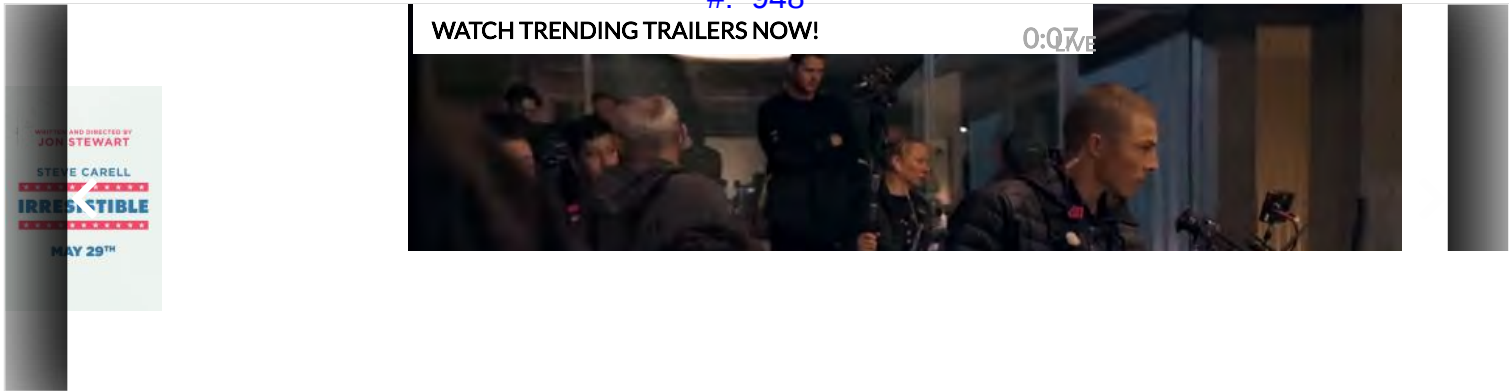
- Savannah, GA clubhouse is being forced to move.
 - “GRIZZ” from Savannah is out of the club
 - “JESSIE” in Alabama was involved in a motorcycle robbery/scam involving another OUTLAWS Member for \$10,000 and is out of the club in bad standing
 - All patches in the COPPER REGION have to go through “LIGHTNING”.
 - There is a new OUTLAWS MC Chapter starting mid-summer in Madison, WS
 - “RABBI” from Wisconsin is out of the club
 - Black Pistons MC is updating their Chapter list and should be available soon.
8. Additional information was also presented concerning runs and events that are scheduled for this summer, as well as listings of OUTLAWS MC Members that are in the hospital or who have recently been involved in motorcycle accidents. A copy of SA Grabman’s (who attended this meeting) handwritten notes, have been placed in the ATF case file.
9. Following this meeting, all the OUTLAWS MC Members listed above who came to the undercover residence, along with SA’s Grabman, Ozbolt and Anderson and the two Confidential Sources (CS’s) went to eat at a local restaurant in Hopewell, Virginia. After eating dinner, while standing outside the restaurant, MARCICIA made statements about having “MAGGOT ALAMODE for desert or better yet MAGGOT LIVER”. MAGGOT is a derogatory term used by the OUTLAWS MC referring to the HELLS ANGELS MC. During this conversation, WERTH stated that he wanted to go down to the area where the HELLS ANGELS MC or their Affiliates might be, send three OUTLAWS MC Members inside see what happens and the rest can come in behind.
10. After eating, WERTH told SA Grabman to find out where the HAMC and/or their Associate clubs would be that evening. SA Grabman told WERTH that he had not been to any of their (HAMC Members and/or associates) bars in the Richmond, Virginia area before. SA Grabman stated that the only bar that he was aware that the HAMC Affiliate clubs, DESPERADOS MC, MERCELESS SOULS MC and the PURE EVIL MC frequent was a bar called the “COCKADES” located in Petersburg, Virginia. SA Grabman further stated that he did not know where it was located. WERTH instructed SA Grabman to find out the exact location of the bar and stated that this was the place that he wanted to go to that evening. SA Grabman attempted to get WERTH to go to an OUTLAWS MC and PMC friendly bar, the Southern Star, but WERTH stated he did not want to go there and again instructed SA Grabman to locate the COCKADE bar. SA Grabman then called PMC PRESIDENT LOVE to find out where the bar is located. LOVE gave SA Grabman a general location of the bar and then put DEVILS GRIP MC PRESIDENT, Chuck BARLOW on the telephone who gave further directions. During this conversation, LOVE told SA Grabman to call him if they ran into any HAMC Affiliate club Members, stating that he and several other PMC Members would be there to help them if needed.
11. While driving to the COCKADE bar, WERTH called SA Grabman, who was in a separate vehicle, and instructed him to find a place for everyone to pull off so he (WERTH) could discuss the plan that he had devised. The undercover agents and CS’s, followed by the OUTLAWS MC Members, pulled into a school parking lot off Highway 36 and parked. Everyone exited their respective vehicles and WERTH then detailed his plan. WERTH stated that he wanted three of the smaller OUTLAWS MC Members, selecting SA Anderson, one of the ATF CS’s and OUTLAWS MC Member DAVEY, to go into the bar first. WERTH then stated that himself, MARCICIA and MCCALL would then go into the bar “slick back”, referring to not wearing their colors. WERTH stated that SA’s Grabman and Ozbolt, along with BEATTY and TIMBERS, would wait outside the bar and watch over Mike SMITH, who would stand outside the bar, in plain site wearing his OUTLAWS patch, to try to lure anyone outside into the bar. SA’s Grabman and Ozbolt, along with BEATTY and TIMBERS, were then to follow SMITH into the bar, approximately 15 minutes after the first group entered the bar. While in the parking lot, WERTH, MARCICIA and MCCALL were observed with firearms, placing them on their person.
12. Everyone then left the parking lot in their respective vehicles and drove directly to the COCKADE bar, located at 305 N. SYCAMORE STREET, PETERSBURG, VIRGINIA. As planned, one of the ATF CS’s, DAVEY and SA Anderson, all wearing their OUTLAWS MC patches, entered the bar first, shortly thereafter followed

by WERTH, MARCICIA and MCCALL, who were not wearing any OUTLAWS MC insignia. Approximately 5-10 minutes later, SMITH walked up, wearing his OUTLAWS MC patch and stood across the street from the bar. Within five minutes, two Members of the DESPERADOS MC walked up along side the bar with two females. As they neared the front of the bar, they motioned for the two females to walk back from the direction from where they had come and were heard telling the females to go back to the car. The two DESPERADOS then walked into the middle of the road and began verbally confronting SMITH. The DESPERADOS were heard yelling at SMITH, stating that Petersburg was “their town” and that the COCKADE was “their bar”. SMITH responded that VIRGINIA is an OUTLAW state, that Petersburg is an OUTLAW town and this is an OUTLAW bar now. After a couple of minutes of this banter, the two DESPERADOS entered the bar. Shortly thereafter followed by SMITH, BEATTY, TIMBERS and SA’s Grabman and Ozbolt, who were all wearing OUTLAWS MC patches. When the two DESPERADOS MC Members entered the bar, they were joined thereafter by a third DESPERADO wearing a DESPERADOS MC patch. Two of the DESPERADOS MC Members walked past SA Anderson, DAVEY and the ATF CS and then continued onto and entered the men’s restroom near the rear of the bar.

13. After a brief time period, the two DESPERADOS MC Members exited the bathroom and as they walked past SMITH and BEATTY, they engaged in a heated conversation with SMITH and BEATTY. During this verbal confrontation, SMITH began physically assaulting one of the Members of the DESPERADOS MC. During this confrontation, the DESPERADOS MC Member attempted to retrieve a large Mag Light from his rear pocket. As he began to remove the flashlight, SA Ozbolt grabbed it from his hand (this flashlight was placed into ATF Evidence as Item #031).
14. As the physical altercation began, SA’s Grabman and Anderson, who were approximately 5-6 feet away from the altercation and who were not participating in the altercation, were assaulted by a DESPERADOS MC Associate, during which this individual struck SA Grabman across the face with a full beer bottle, leaving SA Grabman with a gash on his forehead, which produced a large amount of blood. SA’s Grabman and Anderson, disarmed this individual, utilizing their ATF issued batons and this individual then ran out of the bar.
15. During this assault, the DESPERADOS MC Members exited the bar. SA’s Grabman and Ozbolt also exited the bar a short time later and walked back to the ATF undercover vehicle to attempt to remove the blood that had come from SA Grabman’s facial injury and to attempt to stop the bleeding.
16. Shortly thereafter, SA’s Grabman and Ozbolt exited the vehicle and walked back into the bar. During this assault, and while seated in the vehicle, SA Grabman received several telephone calls from PAGANS MC PRESIDENT Charles LOVE, AKA REBAR, as well as SA Ozbolt received several calls from UNTAMED MC Member “CHEW CHEW”. SA Grabman spoke with LOVE during one of these calls and informed LOVE that the OUTLAWS were at the time engaged in an ongoing assault with the DESPERADOS MC. It was later learned that LOVE, PMC Lynchburg Member “TORCH”, PMC Richmond SGT-at-ARMS JIMBO, DEVILS GRIP MC PRESIDENT Chuck BARLOW and UNTAMED MC Member CHEW CHEW, had showed up at the bar to help participate in the assault of the DESPERADOS MC Members. Further details of their participation are detailed in a separate ATF ROI.
17. SA’s Grabman and Ozbolt re-entered the bar and all the rest of the OUTLAWS MC Members were still in the bar. A short time later, several marked police units from the Petersburg Police Department arrived at the bar. All of the OUTLAWS MC Members, including the undercover agents and the CS exited the bar and walked together around the corner. As they walked they observed numerous Members of the DESPERADOS MC standing in a parking lot. WERTH, MARCICIA and SMITH began walking toward these DESPERADOS MC Members, followed by the rest of the OUTLAWS MC Members, to include the ATF undercover agents and the CS. As they approached the DESPERADOS MC Members, a female was observed passing a handgun through an open window of her vehicle to one of the DESPERADOS MC Members who was next to the vehicle (this is the same DESPERADOS MC Member, believed to be identified as AKA “RAMBO”, the ENFORCER for the PETERSBURG, VIRGINIA DESPERADOS MC CHAPTER. WERTH, who had walked to approximately 15 feet from where the DESPERADOS MC Members were standing, made a statement to the DESPERADOS MC Member who was now holding the handgun at his side, that he (WERTH) knew that the individual had the gun

in his hand, stated words to the effect of “you are a f%er, lets see if you are willing to do what it takes to be a 1%er”. At this point, WERTH pulled back his coat and placed his hand on his pistol, which was now in open view and MARCICIA withdrew his silver colored revolver from the back of his pants, showing it to the DESPERADOS MC Members and then placed it under his arm. During the course of this confrontation, the DESPERADOS MC Member who had assaulted SA Grabman with the beer bottle inside the bar, withdrew a knife and held it at his side in confrontation to SA’s Grabman and Anderson, who had walked to where he was standing in the group. SA Grabman disarmed this individual utilizing his ATF issued baton and the individual then ran from the area. After a short verbal exchange between WERTH and the DESPERADOS MC Members present, local law enforcement marked units began arriving in the area. The OUTLAWS MC Members, to include the undercover agents and the CS, then walked away from the area.

18. Following this incident, it was discovered that DAVEY had been arrested inside the bar by officers from the Petersburg Police Department for possession of brass knuckles and a concealed weapon (knife). DAVEY was allowed to bond out on the misdemeanor violations and later met up with undercover agents. During this time, SA Ozbolt received a telephone call on his undercover phone from CHEW CHEW. When SA Ozbolt answered the telephone, he discovered that it was PMC PRESIDENT LOVE that had utilized CHEW CHEW’s phone to call him. During this discussion, LOVE told SA Ozbolt about how he (LOVE), along with PMC Member TORCH, PMC SGT-at-ARMS JIMBO, DEVILLS GRIP MC PRESIDENT Chuck BARLOW and UNTAMED MC Member CHEW CHEW had come to the COCKCADE bar to help assault members of the DESPERADOS MC with the OUTLAWS. LOVE told SA Ozbolt that they had jumped out of their vehicle with three axe handles and a gun and chased down some of the DESPERADOS MC Members.
19. The OUTLAWS MC Members and the undercover agents and CS, regrouped and then went to Live Wires bar, located in Hopewell, Virginia, during which no additional incidents occurred. During this time, TIMBERS and BEATTY left the bar, stating that they were driving back home.
20. After leaving the Live Wire bar, The OUTLAWS MC Members, along with the undercover agents and the CS drove back to the undercover residence. While driving back to the undercover residence, Mike SMITH, who was riding in the undercover vehicle with SA’s Grabman and Ozbolt, along with DAVEY, stated that “bad part about being in another state is I feel naked without my gun, you know I am a felon, I’m not supposed to have one”. A criminal history check of SMITH’s criminal background shows that he is in fact a convicted felon.
21. Upon returning to the undercover residence, there were brief discussions concerning the evening’s incident. Additionally, WERTH was observed removing the pistol that he carried in a belly band around his waist. SA Ozbolt was allowed by WERTH to look at the pistol, which is described as a silver in color, Ruger P 90 pistol. SMITH and DAVEY did not stay at the undercover residence, but instead returned and utilized the room at the Fairfield Inn, which had been used to conduct the earlier Regional Bosses meeting.
22. The following morning, March 15, 2009, around 9:00am, the OUTLAWS MC Members who had stayed at the undercover residence, WERTH, MARCICIA and MCCALL, left and drove back to North Carolina.
23. Further details of this event are contained on the audio CD recording made from the recording device worn by SA Ozbolt, which has been placed into ATF Evidence as Item #E-089.



Hells Angels ambushed Pagans in Augusta County shooting

Brad Zinn, The News Leader

Published 1:52 p.m. ET Oct. 4, 2018 | Updated 1:59 p.m. ET Oct. 4, 2018



(Photo: Submitted/ACSO)

STAUNTON - During the early morning hours of Sept. 10 at the Hometown Inn near Greenville, five men — four of them reportedly members of the Hells Angels motorcycle gang and the other a prospect — were lying in wait after two members of the rival Pagans Motorcycle Club were spotted across the street at the Pilot Travel Center.

Roughly 90 minutes later, as the two Pagans pulled into the motel parking lot on their motorcycles, an ambush was unleashed, based on video evidence shown Thursday in Augusta County Circuit Court.

One of the Pagans was shot, the other knocked off his motorcycle and beaten with a hammer.

More: [Staunton woman faces child abuse charge \(/story/news/local/2018/10/03/staunton-woman-charged-child-abuse/1507902002/\)](/story/news/local/2018/10/03/staunton-woman-charged-child-abuse/1507902002/).

Prior to the shooting, which took place shortly before 3 a.m., after the two Pagans were seen at the travel center, one of the motorcycle gang members roused four others from their rooms at the motel.

After the men took off their Hells Angels gear and changed into different clothing, one of the Hells Angels kept close tabs on the Pagans across the street with binoculars. Another was seen holding an iPad in their direction as he presumably filmed them, motel surveillance video showed. Three other Hells Angels were nearby.

An
roo

Fourth of July Sale.

As
wip
inv

\$3 for 3 months. Save 90%.

Subscribe Now

News

clerk, unaware there were now rival gang members at the motel, gave them a
ng to evidence.

second rider was knocked off his motorcycle as it was still moving. The rider in front
to the ground. As he ran, two Hells Angels opened fire on him, video showed. An

The victim was struck once in the lower left side of his back. He survived the shooting and was released from the University of Virginia Medical Center in Charlottesville after a week-long stay, according to testimony.

Get the **Daily Briefing** newsletter in your inbox.

Non-subscriber Daily Newsletter

Delivery: Daily

Your Email



The beating victim was not seriously injured.

Both victims were members of the Pagans Motorcycle Club out of southern Virginia, the sheriff's office said.

More: [Sex offender arrested in Verona stun gun attack \(/story/news/local/2018/10/03/sex-offender-charged-verona-stun-gun-attack/1508613002/\)](/story/news/local/2018/10/03/sex-offender-charged-verona-stun-gun-attack/1508613002/)

Seven suspects were arrested at the scene. Two guns and a shell casing were recovered at the motel by investigators.

Following the shooting, Augusta County Sheriff Donald Smith said both groups were passing through the area following an unidentified convention.

One of two men accused of opening fire is Anthony Milan, 28, of East Elmhurst, New York. Milan is a prospective member of the Hells Angels in New York City, according to evidence. He appeared in Augusta County Circuit Court on Thursday in an attempt to get a bond set.

Dominick J. Eadicicco, 48, of Staten Island, New York, is also suspected of opening fire, evidence showed.

Milan, Eadicicco and three others are charged with two counts of malicious wounding by a mob, along with single counts of conspiracy to maliciously wound, gang participation in a criminal act and use of a firearm in the commission of a felony.

In court Thursday, Milan, who has no prior felonies, was denied bond.

Two other Hells Angels were not charged in the attack but face drug and gun charges.

All seven suspects remain behind bars.

More: [Two dead in Nelson County crash \(/story/news/local/2018/10/02/two-dead-nelson-county-crash/1506696002/\)](/story/news/local/2018/10/02/two-dead-nelson-county-crash/1506696002/)

Read or Share this story: <https://www.newsleader.com/story/news/local/2018/10/04/hells-angels-ambushed-pagans-augusta-county-shooting/1521012002/>

1 free article left.

Fourth of July Sale.
\$3 for 3 months. Save 90%.

Subscribe Now

News

.



Pagan Bikers Indicted in Brawl

FRANK ELTMAN March 12, 2002

NEW YORK (AP) — Seventy-three members of the Pagans motorcycle gang were indicted Tuesday on federal racketeering charges stemming from a fatal brawl last month at a rival biker group's convention on Long Island.

The fight at the Hells Angels-sponsored Hellraisers Ball left one man dead and at least 10 others injured during the Feb. 23 motorcycle and tattoo expo in Plainview.

Prosecutors allege the Pagans were outraged the Hells Angels scheduled an event on what they still consider their home turf. The Pagans had been Long Island's dominant gang until their ranks were decimated by federal prosecutions several years ago.

ADVERTISEMENT

Trending on AP N

California govern
commutes 21 ser

Prosecutors allege that Pagans members from Ohio, Pennsylvania, Maryland and elsewhere converged on Long Island and conspired to attack the Hells Angels event. Hundreds of weapons, including knives, bats, brass knuckles and shotguns, were seized.

Mark Lancaster, a lawyer for the 73 Pagans, who were being held without bail, insisted the Pagans arrived ``with a purely peaceful intent'' and were attacked by Hells Angels.

Prosecutors allege some Pagans had written out wills before heading to the expo, and several wore bulletproof vests.

Among those at the Hellraisers Ball were Sonny Barger, the Angels' legendary leader, and Chuck Zito, a member who appears in the HBO series about prison life, ``Oz.''

French ex-prime
found guilty of fr

Rolling Stones th
over using their s

AD

BREAKING NEWS



H-E-B cases jump by 24

USAA closes offices to workers until at least 2021

Converse man charged with murder, leads police on high-speed...

SAPD officer arrested after being found with assault victim

Body of girl, 1, found in Guadalupe after kayak overturned



<https://www.mysanantonio.com/news/local/article/San-Antonio-Bandido-who-killed-Hell-s-Angel-13282005.php>

San Antonio Bandido who killed Hell's Angel member gets 18 years in prison without parole

By **Guillermo Contreras** Updated 2:55 pm CDT, Thursday, October 4, 2018



IMAGE 1 OF 84

Robert Romo was sentenced to 18 years without parole for killing a rival biker in 2006. **Click through the gallery to see other Bandidos sentenced in Texas and other facts about the notorious MC club.**

A San Antonio man who killed a member of the Hell's Angels in 2006 to gain membership in the rival Bandidos Motorcycle Club was sentenced Thursday to 18 years in prison without parole.

Robert Romo, 45, testified at a trial for the Bandidos' former two top leaders that he was the triggerman in the March 2006 shooting of Anthony W. Benesh III, who was slain outside a pizza restaurant in Austin in front of his children and girlfriend.

Benesh's killing was unsolved for 11 years, until federal authorities in early 2017 developed information that led them to charge Romo and three other Bandidos in the murder, among them Romo's older brother, Johnny "Downtown" Romo, 48, who was a high-ranking national sergeant-at-arms in the Bandidos.

Up Next - RELATED NEWS: MLB's fanless return and its impact on local businesses

RELATED: SAPD: James Avery worker pawned nearly \$18K in stolen jewelry

Like Johnny Romo, Robert Romo faced life in prison without parole, but prosecutors also asked Senior U.S. District Judge David Ezra for a reduction. The judge gave Robert Romo 18 years for murder in aid of racketeering and 18 years for using and

discharging a firearm in aid of a racketeering murder, then ran the sentences concurrently.

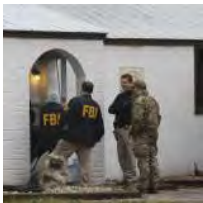
Johnny Romo pleaded guilty to the same charges as his brother and received a sentence of 15 years without parole on Wednesday.

Related Stories



Bandidos' secrets spilled by ex-national ranking member

Judge hands down fate for Bandidos leader in S.A.



Bandido learns fate for retaliation killing near San Antonio



San Antonio judge sentences Bandido turned informant to 15 years without parole



Jurors hear wiretaps and recorded Bandidos meetings



Bandidos ex-president admits using cocaine but denies racketeering

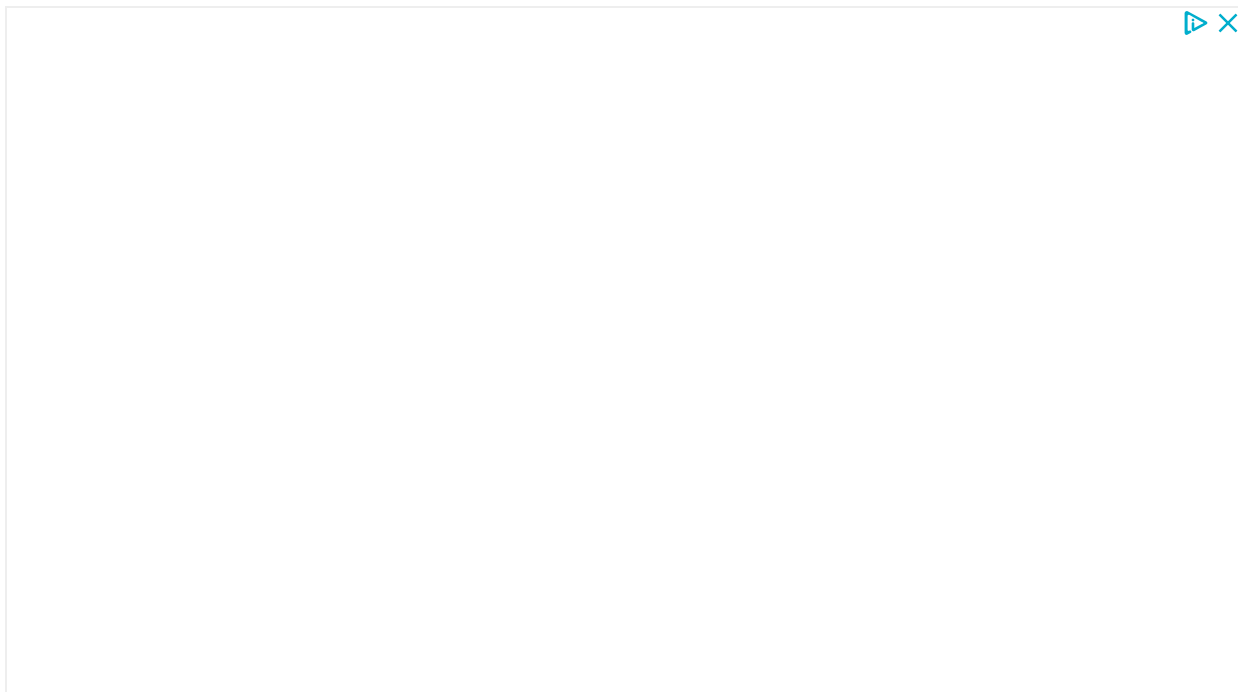
At trial, the Romo brothers testified that the hit on Benesh was ordered by then-Bandidos national president Jeffrey Fay Pike and the directive was passed on to Johnny Romo by John Xavier Portillo, who was a national sergeant-at-arms in 2006 and went on to become national vice president in 2013. Benesh, who had planned to start a chapter of the Hell's Angels in Austin, had ignored warnings from the Bandidos to not fly Hell's Angels colors in Texas, which is considered the Bandidos homeland and territory.

Pike, 63, of Conroe, and John Portillo, 59, of San Antonio were sentenced last week to life in prison without parole after they were convicted of charges that they sanctioned, ordered or led the bikers' racketeering conspiracy over several years.

RELATED: Jurors deciding man's fate in child sex attack blamed on dogs

According to Robert Romo's testimony, the hit crew, using

walkie-talkies to communicate while



POWERED BY CONCERT

FEEDBACK

in two separate vehicles, staked out Benesh's home over two days, deciding to move in on the second day for the kill. The day of the slaying, Robert Romo brought a hunting rifle fitted with a scope that he had borrowed from a friend over a year earlier, according to Robert Romo's testimony.

Both Romos also testified that Robert Romo was rewarded by being made a full-patch Bandidos member earlier than is normal and that he was made a part of a squad called the Fat Mexican Crew, tasked as enforcers for the Bandidos' national chapter. The "Fat Mexican" is the Bandidos insignia widely seen on their motorcycle vests and accessories.

*Guillermo Contreras covers federal court and immigration news in the San Antonio and Bexar County area. Read him on our **free site**, mySA.com, and on our **subscriber site**, ExpressNews.com. | gcontreras@express-news.net | Twitter: [@gmaninfedland](https://twitter.com/gmaninfedland)*

© 2020 Hearst Communications, Inc.

HEARST

APRIL 2007

The Gang's All Here

When a beloved brother died last summer, more than four hundred bikers thundered into San Antonio for his funeral. As they swapped stories about the old days and guzzled beer, one message could be heard over the roar of their Harleys: Bandidos forever.

BY SKIP HOLLANDSWORTH

ISSUE APRIL 2007

SHARE

NOTES 0 COMMENTS

THEY BEGAN ARRIVING AT THE MISSION PARK They began arriving at the Mission Park Funeral Home in San Antonio early on a Friday afternoon. They came in packs, riding two, sometimes three abreast, their motorcycles roaring loudly enough to rattle all the funeral home's windows.

People who worked in the nearby stores and businesses rushed outside to get a better look. One man, standing in the parking lot of a Mexican restaurant, called a friend on his cell phone and shouted, "There must be a hundred of them!" A woman driving a Ford Taurus swerved to the shoulder of the road and slammed on her brakes as a group of them raced past her, missing her car by inches.

They kept coming and coming, their wind-burned faces grim and purposeful. They were dressed in steel-toed boots, jeans, and their "colors": denim or black leather vests covered with a variety of red-and-gold patches that carried such slogans as "Loyalty is our honor," "Our colors don't run," and "Expect no mercy." On the back of every vest was a large patch of a bellicose Mexican bandit brandishing a pistol and a machete.

"It's the Bandidos!" yelled the man in the parking lot. "The Bandidos are here!"

On this September afternoon, the members of the Bandidos Motorcycle Club were indeed

On this September afternoon, the members of the Bandidos Motorcycle Club were in San Antonio. They had come to pay their respects to one of their early members, Luis Bonilla, a.k.a. Bandido Chuco, who had died at the age of 65 from liver cancer. They thundered into the funeral home's parking lot, gunning their engines again and again, sending thick clouds of exhaust into the air. One Bandido popped a wheelie on his Harley-Davidson and rode on his back tire for at least thirty yards. Another raced down the parking lot, hit his brakes, leaned his entire body to the left, whipped his motorcycle around, and then raced the other way. On the back of some of the motorcycles were the Bandidos' wives or girlfriends, known as PBOLs: Proud Bandido Old Ladies.

Standing in the doorway to the chapel, the thin, dark-suited director of the funeral home smiled nervously, his lips as pale as milk. "They promised us there would be no trouble," he said hesitantly as the Bandidos parked their bikes and began hugging and kissing one another on the mouth—the traditional Bandido greeting.

"I love you, brother!" barked one beefy, middle-aged Bandido, wrapping his tattooed arms around a Bandido whose long gray hair was held back with a bandanna.

"Man, that Chuco was a bad motherf—er," said another, wearing a T-shirt underneath his vest that read "Snitches are a dying breed!" "Remember how he used to say that if we ever had a problem, we should handle it very, very violently?"

The men roared with laughter. There were more bear hugs and kisses as more Bandidos arrived. A flask or two was passed around. Several of them headed into the chapel to see Chuco in his casket. He was dressed in his favorite black T-shirt, black jeans, and his Bandidos vest. He was surrounded by bouquets of flowers, along with photos of him in his younger days standing beside his motorcycle or next to topless biker chicks.

Suddenly, the Bandidos heard a sound in the distance, a distinct *whomp-whomp-whomp*. They walked back outside, looked up, and saw a helicopter coming right at them. It banked to the right and began to circle the funeral home. In the helicopter's open door were a couple of men in police uniforms holding binoculars.

"The pigs are here," someone said.

For a few moments, the Bandidos stood there, unmoving. And then, as if given a silent cue, several of them lifted their hands in unison and flashed their middle fingers toward the sky.

who the Bandidos are. You probably have no inkling that they were once the terrors of Texas, so fearsome that when a rumor spread through a town that they were coming, people literally headed inside their homes and locked their doors.

And even if you do know who they are, you could very well have trouble believing they still exist. The Bandidos? The renegade motorcycle gang? Aren't they long gone, artifacts of the *Easy Rider* era? Hasn't the motorcycle world been taken over by lawyers, doctors, and advertising executives, all those self-proclaimed "chromosexuals" who pull back their hair in neat ponytails and don designer sunglasses and expensive black leather jackets so that they can take leisurely rides through the countryside on sunny weekend afternoons?

In fact, the Bandidos are not just hanging on, they are thriving. With an estimated 800 to 1,000 members in sixteen states (about 400 in Texas alone) and another 1,400 members in Canada, Europe, and Australia, they are now as large as the fabled Hells Angels, from California, and according to law enforcement officials who investigate the club, the new Bandidos—or at least some of them—are just as ribald and rebellious as the originals, whom the cops used to chase day and night.

In the past couple of years alone, police around the country have arrested Bandidos for everything from drug dealing and kidnapping to possession of illegal weapons and trafficking in stolen vehicles. Bandidos have been accused of threatening people who were preparing to testify against them in court and of beating and even shooting any member of rival motorcycle clubs who has either not shown them the proper respect or attempted to invade one of their territories.

Last March, for instance, police in Austin announced that the Bandidos were the prime suspects in one of the city's most shocking murders: the slaying of a 44-year-old local motorcyclist named Anthony Benesh. Benesh, who had been trying to start an Austin chapter of the Hells Angels, had been shot in the head, apparently by an unseen sniper, as he was leaving a North Austin restaurant with his girlfriend and two children. According to homicide detective Frank Rodriguez, in the days before his murder, Benesh had been receiving telephone calls from Bandidos telling him to stop wearing a vest that displayed Hells Angels patches. Obviously, said Rodriguez, Benesh didn't follow their advice.

But it's not only the Bandidos' rivals who are getting killed. Less than a month after the Benesh shooting, eight Bandidos were found stuffed inside abandoned vehicles in a field in Canada. Investigators speculated that the victims had been killed by a team of hit men as part of an "internal cleansing" ordered by the Bandidos' leaders. "Unlike the Hells Angels, who have tried to finesse their public image with tov runs and other charitv stunts." wrote

the Canadian journalist Julian Sher, who has spent years covering motorcycle gangs, “the Texas-based Bandidos have never shied away from flaunting their brutal pedigree. ‘Cut one, we all bleed,’ the Bandidos warn—and the blood has never stopped flowing, often from internal strife as much as external battles.”

Today the police seem more determined than ever to bring the Bandidos down. Federal prosecutors have gone so far as to indict Bandidos under the Racketeer Influenced and Corrupt Organizations Act (RICO), a federal statute originally intended to destroy Mafia families, claiming that the club is an “organized criminal enterprise” that resorts to “intimidation, extortion, violence and threats of violence against rival motorcycle clubs” to maintain its “power, territory and profits.” This past August, the federal government also admitted in a court filing that the Bureau of Alcohol, Tobacco, Firearms and Explosives, along with “other investigative agencies,” was carrying on “active investigations” into the club. And according to the law enforcement gossip mill, at least one of those investigations is now focused on Texas, where all the Bandidos’ national officers live.

Yet as they made abundantly clear at their gathering in San Antonio, the Bandidos are not remotely intimidated. Throughout that Friday afternoon and into the evening, Bandidos continued roaring toward the funeral home, some of them coming from as far northwest as Washington and as far southeast as Alabama. Old Bandidos who had retired from the club years ago showed up, many of them with backs and hips so creaky they were barely able to throw their legs over their choppers, and the new generation of Bandidos also came, sitting astride \$30,000 custom-made Harleys with perfect pinstriping. Even a handful of European Bandidos had flown in for the occasion, borrowing motorcycles from members of the San Antonio chapter so they too could ride.

“Let me tell you one thing, my friend,” said a Bandido who had seen me standing quietly by the funeral home’s front door taking notes. He had introduced himself only as F.O., and he was one of the most intimidating-looking men I’ve ever seen. Built like a professional wrestler, he had thick black hair and a black Fu Manchu mustache, and just below his chin was a tuft of beard tied up with string and held in place by a fourteen-karat gold skull with diamonds in the eyes.

F.O. lifted one of his meaty arms and poked me so hard in the chest with his forefinger that I thought my sternum was going to crack.

“We are Bandidos forever, forever Bandidos,” he said. “We are brothers until the day we die.

And no one, absolutely f—ing no one, is going to take that brotherhood away.”

I SAW MY FIRST BANDIDOS IN 1969, when I was eleven years old. My father, a straitlaced Presbyterian minister, took our family to Galveston for a vacation. We were walking in our bathing suits on the sidewalk next to the seawall when a group of them roared past us on the adjoining boulevard, their engines as loud as fighter jets.

“Get down!” my father yelled, as if he thought the Bandidos might shoot us. He ran over and put his arms around one of my sisters, thinking they might kidnap her. “Get down!” he shouted again. It was one of the most thrilling experiences of my life.

For me and my friends, the Bandidos were like the bogeymen. At recess, we swapped stories—perhaps true, perhaps not—about how Bandidos pulled out their enemies’ teeth with pliers and beat them with heavy metal wrenches. We talked about Bandidos carrying bombs with them on their motorcycles, which they used to blow up gas stations that refused to serve them. We even believed that, just for fun, they had sex with dead women.

And as far as we were concerned, the great outlaw of the state was not Sam Bass, John Wesley Hardin, or any of the other nineteenth-century gunslingers mentioned in our textbooks. It was the Bandidos’ founder, Donald Chambers—only he rode a Harley instead of a horse. To this day, I can remember the first time I saw his photo: a mug shot, printed in a newspaper, that had been taken after he had been arrested. He was as lean as a plank, with light brown hair that fell to the bottom of his neck and sideburns that went down to his jaw line, and he stared at the camera with a cocky, you’ll-never-bring-me-down expression.

“He was a hell-raiser, there was no question about that,” said his daughter, Donna Lee Chambers-Miers, who lives near Crockett and used to go barhopping with her father when she was a teenager. “When he started downing shots of Windsor Canadian whiskey, people learned real quick that he was not someone to mess with. God, Daddy was famous for the way he could throw a punch. And if that didn’t work, he’d pull out his knife and start swinging that around too.”

Chambers started the Bandidos in March 1966, when he was 36 years old and working on the ship docks in Houston. In the past, he had been a member of other Houston-area motorcycle clubs, but they had bored him. He told his friends that he was naming his club the Bandidos, in honor of the Mexican bandits who refused to live by anyone’s rules but their own, and he began recruiting his first members not only out of Houston but also out of the biker bars in Corpus Christi, Galveston, and San Antonio.

“Don wasn’t looking for people who fit into what he called ‘polite society,’” said one of Chambers’s first members, Royce Showalter. Showalter, his white hair long and braided, is now sixty years old, living in San Antonio on disability payments and barely able to walk because of past motorcycle accidents. But when I spoke to him, he still smiled brightly at the memory of those early days when Chambers came into his life. “He wanted the badass bikers who cared about nothing except riding full time on their Harley-Davidsons. He wanted bikers who lived only for the open road. No rules, no bullshit, just the open road.”

In that era there were already a number of hard-core biker clubs scattered throughout the country, including the Outlaws, the Pagans, and, of course, the Hells Angels, which had been formed shortly after World War II. Those clubs called themselves the One Percenters, a phrase stolen from a former president of the American Motorcyclist Association who once declared, after a rumble between two motorcycle clubs in California, that 99 percent of motorcyclists were law-abiding citizens and 1 percent nothing more than “outlaws.” The Hells Angels were particularly notorious: The year Chambers started the Bandidos, soon-to-be-famous journalist Hunter S. Thompson published *Hell’s Angels: The Strange and Terrible Saga of the Outlaw Motorcycle Gangs*, a book that detailed the club’s violent, drug-fueled adventures.

“All of us read it to get some ideas on what we should be doing,” said Showalter. “And then we looked at one another and said, ‘Hell, we can do a lot better than these guys.’”

By the early seventies, Chambers had more than one hundred members, many of whom were restless young Vietnam veterans who, in the words of one Bandido I spoke to, “had gotten bored sitting at home trying to be nice after the government had taught them how to be so bad.” The original Bandidos had wild, unruly hair, scraggly beards, huge tattoos, and cigarettes sticking out of their mouths, and they went by such nicknames as Revolver, Pecker, Deadweight, Rawhide, Coonass, and Crankcase. One member was nicknamed Log Cabin because he loved drinking whiskey from a Log Cabin syrup bottle. Although the club was made up mostly of white males, Chambers welcomed Hispanics, and for a couple of years, there was one black man who rode with the club. His nickname was Spook.

In some ways, oddly, the Bandidos were not all that different from any other fraternal organization. Just like the Rotary Club, each chapter was required to have a weekly meeting where attendance was taken and dues paid. Just like the Lions Club, its members had vests and were given rules about wearing them. (A Bandido was required to wear his vest whenever he rode his motorcycle. Conversely, if he was in a car, he had to take it off.) Like

the Elks, the Bandidos had their own clubhouses, and like the Masons, they had their own initiation rites.

But that's where the comparisons ended. Consider, for instance, the gold-colored "courtesy card" that Chambers printed up for his members to give to "citizens" (the word they used to describe nonmembers). Embossed in red at the top of each card was the Bandidos' ominous motto: "We are the people our parents warned us about." In the lower left corner were the initials "FTW" (for "F— the World"). And in the middle of each card was the phrase "Bandido by profession, Biker by trade, Lover by choice, You have just had the honor of meeting ...," which was followed by that particular member's signature.

Or consider the Bandidos' initiation rites. Once a new member received his Bandidos vest, he was ordered to lay it on the ground. The other members of his chapter then urinated, vomited, and defecated on it. The new recruit was then required to put the vest back on and dry it out by riding on his motorcycle.

"We were so crazy back then it's amazing we are alive," said Showalter. "We'd go flat out on our motorcycles all day long, eighty to ninety miles an hour, and then at night, we'd hold our parties far out in the woods so the cops wouldn't find us. There was booze and drugs everywhere. We had girls show up who wanted to screw everyone. There was always someone stumbling into the bonfire and someone else shooting a pistol into the air. We'd party till dawn, go to sleep right there on the ground, and then get up, get on our motorcycles, and hit the road again."

Then, in 1972, Chambers and two other Bandidos were arrested for shooting to death two drug dealers in El Paso over a botched sale. The police said that before killing the dealers, Chambers had made them dig their own graves. Then Chambers and the other Bandidos had set their bodies on fire before burying them.

Chambers was sentenced to two consecutive life terms in prison, leading some police officials to speculate that the Bandidos, without their founder, would disband. But his right-hand man, Ronnie Hodge, another former Houston dockworker, who was the size of a grizzly bear, took over and did not make the slightest attempt to tone down the Bandidos' renegade image. Throughout the seventies, they were arrested for dealing drugs, running prostitution rings, extorting money from the owners of roadhouses and strip joints—even operating illegal pit bull fights.

"Yep, we were the bad boys," said one of the most infamous Bandidos from those years, 63-year-old Franklin "Stubs" Schmick, who now lives in East Texas with his Old Lady of the

past fifteen years, Barbara “Dummy” Schmick, a chatty, sassy woman who, during the seventies, was renowned among the Bandidos for her bombshell looks and her extracurricular activities at an Austin nude-modeling studio. “I’ll be honest, it was a lot more fun back then. The police had no cell phones and no video cameras, which meant we all had a much better chance of getting away.”

IN THE LATE SEVENTIES, the Bandidos became suspects in two of the state’s most publicized shootings: the attempted slaying in 1978 of James Kerr, an assistant U.S. attorney in San Antonio who was reportedly conducting an investigation into the club, and the 1979 assassination of U.S. district judge John Wood Jr., of San Antonio, who was known as Maximum John for his merciless sentences for drug offenders, a few of whom were Bandidos.

Kerr identified three Bandidos in a police lineup as his possible assailants. In the Wood case, more than one hundred Bandidos were subpoenaed to appear before a federal grand jury. Suddenly, the club found itself in the national spotlight: In *Newsweek*, they were described as “the single greatest organized crime problem” in Texas, and on ABC’s *20/20*, a

young Geraldo Rivera noted that seven of the club’s eight national officers had criminal records “involving drugs, guns, or violence.”

Unrepentant, the Bandidos insisted that they had not shot the prosecutor or the judge and that the only reason they were being harassed was because of their anti-establishment posturing. (In the *Newsweek* article, a defiant Hodge snarled, “We’re the last free Americans.”) And when members of an El Paso crime family, the Chagras, were eventually convicted of hiring hit men to shoot Kerr and Wood—Wood’s killer was Charles Harrelson, the father of actor Woody Harrelson—the Bandidos promptly celebrated by throwing huge parties and racing around on their motorcycles, shooting their middle fingers at just about everyone they came across, including cops.

Furious, law enforcement agencies redoubled their efforts to bring the club down. Some police departments formed motorcycle gang task forces. The FBI went so far as to buy a biker bar in Dallas, bringing in as the “owner” a New York agent who tried to find out what the Bandidos were up to.

In 1985, after a long undercover investigation, hundreds of federal agents and local police officers in eight states arrested nearly one hundred Bandidos and their associates on charges of narcotics trafficking. (To round up the Bandidos in Lubbock, the police used an armored personnel carrier to bust into their fenced compound.) And in 1988 almost all the

Bandidos' national officers, including Ronnie Hodge and Stubs Schmick, who was then a national vice president, were arrested by federal agencies for conspiring to bomb homes and automobiles belonging to members of the Banshees, an upstart Dallas motorcycle club.

"The feds thought that they finally had us with that one, that there would be no one left to run the club," chuckled Schmick, who, along with Hodge, was given a five-year sentence. "But by the time we headed off to prison, we already had the next group of leaders ready to go. That's the Bandido way."

IN 1998 THERE WAS TALK ONCE AGAIN that the Bandidos had suffered a fatal blow: Craig "Jaws" Johnston, who was then the Bandidos' president, and other leaders pleaded guilty in federal court to charges that they had conspired to manufacture and sell as much as a thousand pounds of methamphetamine. But the Bandidos kept right on growing, opening new chapters throughout the country. The club also continued expanding into Canada, Australia, and Europe, where young motorcyclists were enamored of the Bandidos after reading about their exploits in biker magazines. The European Bandidos proved themselves to be just as aggressive as their American counterparts, setting off a turf war

with Europe's Hells Angels and at one point firing anti-tank grenades at two Hells Angels clubhouses in Denmark.

The Bandidos were so brazen that they even started their own Web site. It contained a list of all the Bandidos' chapters, photos of famous dead Bandidos such as Chambers (who died of cancer in 1999) and Hodge (who died of heart disease in 1992), and a page where supporters and wannabes could purchase Bandidos T-shirts, clocks, coffee cups, tote bags, calendars, and thong panties. (Written on the front of the panties was the phrase "Support Your Local Bandidos.")

In 2005 the feds made their next assault on the Bandidos' empire. They hit Johnston's successor, George Wegers, who lived in Washington State, and 27 other Bandidos and their associates in that area with a RICO indictment. The specific charges were hardly flashy: Wegers and the others were accused of such varied crimes as stealing motorcycles, kidnapping a rival motorcycle club member (the kidnapping lasted a day), and conspiring to kill a disloyal Bandido associate who was suspected of meeting with federal agents (the killing never took place). Defense attorneys criticized federal prosecutors for stitching together a racketeering case based on minor felonies and misdemeanors. Still, the evidence was strong enough that 18 of the Bandidos, including Wegers, agreed to plea deals in return for short prison sentences.

And as soon as Wegers was gone, the feds quickly began circling his successor, Jeff Pike, who lives just north of Houston. “It’s only a matter of time,” a highly placed Texas law enforcement official told me last spring. “Every man who’s ever been president of the Bandidos has been brought down, and it’s only a matter of time before Mr. Pike gets brought down too.”

On an impulse, I sent an e-mail to the Web site, asking if the 51-year-old Pike would agree to an interview. I figured I wouldn’t hear from him. A couple of undercover police officers who follow the club had told me that Bandidos officers never discuss anything with “citizens.” “They’re not going to be real receptive to a reporter showing up,” one officer said. “You ask one wrong question, and you could be in for an ass-kicking.”

But a couple of weeks later, Pike called. “I hope you don’t believe all that bullshit the feds are feeding you,” he said in a surprisingly cheerful voice. “I’m just a clean-cut American guy who loves riding his motorcycle. You’d be surprised. I’m almost always in bed by ten p.m. Come on down, I’ll talk to you.”

For a second, I didn’t know what to say. “You’re going to let me come to your house—the head of the Bandidos?” I asked.

Pike laughed out loud. “Oh, hell, it’s not like it’s any secret where I live. The cops drive by here just about every day just to see what I’m up to. The Houston FBI agent who investigates us has called me so many times that I’ve got his number on my speed dial. We’ve gotten to know each other so well that I once met him at a Denny’s for a cup of coffee to answer his questions.”

A few days later I drove into a well-kept neighborhood near the Woodlands residential community. I headed down a street containing mostly sprawling ranch-style homes on large lots, at least a couple of acres in size. Toward the end of the road was Pike’s property.

I assumed I would be met by one of his sergeants at arms, eyeing me suspiciously, maybe with a handgun sticking out of the back of his pants. There was a tall front gate with a “Go Away” sign attached to it, but it was wide open. I headed down a dirt road, drove past a stand of trees, and saw an unfinished two-story frame home, about 3,500 square feet. Standing before the home was a handsome, strapping man. He had no visible tattoos and no facial hair except for a neatly groomed goatee, and his crew cut was flecked with gray. He was dressed in blue denim shorts, a white T-shirt, and tennis shoes with white socks. He looked like just another middle-aged man who had spent the morning working in the yard.

“You’re Jeff Pike?” I asked.

“You got him,” he said, shaking my hand and giving me a confident grin.

For a while, we admired his house, which he was building himself; one side of the upstairs had floor-to-ceiling windows and a long balcony. Pike, who’s divorced, told me that although he would be living in it alone, he wanted it to be big enough that his two kids would have a place to stay when they came to visit him from college.

I stared at him. “Kids in college?”

“They’re at a major university right here in Texas,” he said, grinning again. (To protect their privacy, Pike asked me not to name the school.) “You know, we’re not all that different than anyone else. We have families. We take our clothes to the dry cleaners. And we all go to work. We’ve got guys who own their own businesses, guys who work for oil companies, guys who are in the computer industry. Up in Washington, one of our Bandidos is an engineer at Microsoft.”

He showed me his bicycle, which he rides eleven miles a day to stay in shape, and then he led me into the first floor of his house, which was basically a garage containing a couple of vintage automobiles and motorcycles that he was restoring. A few years ago, Pike owned a large street-rod shop in Tomball. Now, he said, he works here alone, restoring and customizing vehicles for select customers—“including a local constable, who knows I do good work,” he said with a smirk.

In one corner of the garage were his Harley-Davidsons. One was a black 1988 Softail Custom. The other he had built himself to look just like a chopper out of the seventies, complete with an elongated Springer front end, high handle bars, and chrome pipes. Next to the Harleys was his Bandidos vest, hanging from a coat rack.

“There’s my stuff,” he said, handing me a bottle of water.

Pike told me that he had been an altar boy at a Catholic church in California, where he was born and raised. But by his teenage years, he had discovered “cigarettes and girls,” and he also became fascinated with motorcycles when he saw a pack of Hells Angels flying down a road. “It was all chrome and noise,” he said. “It was just something you don’t forget, like a cowboy seeing his first train.”

He dropped out of high school, and in 1973 he moved with a buddy to Texas—“partly

because the drinking age was eighteen.” A couple of years later, when he was twenty years old, he bought a big Harley Panhead. “Everyone said to me, ‘Lock it up. The Bandidos live here, and they love to steal motorcycles.’ ”

Eventually, Pike met some Bandidos at a Harley shop in Houston and at the strip joints on Gessner Road, and in 1979 he became a “prospect.” He quickly moved his way up in the club, becoming president of one of Houston’s chapters in 1988 at the age of 33 and a national vice president eleven years later. For a Bandido, he was relatively clean, his rap sheet consisting of just two crimes: In 1987 he paid an \$800 fine after pleading guilty to a misdemeanor assault charge (he admitted stabbing a man who was arguing with him at a party), and in 1992 he received twenty months deferred adjudication after being charged with illegally wiring his house in order to steal electricity from the city of Houston.

But the fact was that few of the new Bandidos were compiling spectacular rap sheets. “These are not your father’s Bandidos,” said Kent Schaffer, a well-known Houston attorney who has been defending the club for 23 years. “Yes, they love riding fast. They love the tough biker persona. They are not Boy Scouts, but they are not outlaws. They are not

getting on their bikes and looking to commit crimes. About the only thing they get these days are speeding tickets.”

Although federal investigators in the 2005 RICO indictment claimed that Bandidos were sometimes required to pay the club a “road tax” (a percentage of their proceeds derived from criminal activities), Ed Winterhalder, a former Bandido from Oklahoma who quit the club in 2003, told me that only 10 percent of today’s Bandidos make a living through crime. “And what they do is not organized crime authorized by the club,” he said. “They trade guns and stolen bike parts. They do some minor drug deals. They might do a burglary here and there. But that’s it.”

On the other hand, said the highly placed Texas law enforcement official, Bandidos have a tendency to turn violent, especially during confrontations with other motorcycle clubs: “What you have to remember is that these men don’t become Bandidos because they are simply motorcycle enthusiasts. They become Bandidos because they love being known as the badasses. And when you get a bunch of men like that together in one club, you better watch out, because there’s no telling what can happen.”

And the police certainly had their doubts about Pike. In surveillance photos, they saw the “Expect no mercy” patch on his vest, which is the Bandidos’ equivalent of the Purple Heart, given to any member who has drawn blood or spilled his own blood in defense of the club.

Their suspicions about him only deepened after the Benesh and the Canadian affairs. The Austin police, in particular, wanted to know if he had ordered the killing of Benesh as a way to send a message to all motorcycle clubs about what he would do to anyone he found moving into Bandidos territory. Canadian authorities were curious to learn if Pike had ordered the shooting of the eight Bandidos to remind other members just what would happen to them if they too turned against the club.

Pike, however, did not seem the slightest bit defensive when I mentioned the cops' theories. "I know they're trying to pin everything on us," he said. "But we're not out there shooting people, for God's sake. None of my guys shot some goofy Hells Angels wannabe who meant nothing to us, and as for that Canada mess, I didn't have any contact with that chapter up there for weeks before those killings. I have no idea what happened to any of them."

Pike sighed and tossed his empty bottled water into a trash can. "Why can't the feds just accept the fact that we're a bunch of old bikers who love to get together and have some fun? Why don't they start chasing real criminals, like those kids in street gangs who scare the

shit even out of me, instead of following us everywhere we go, tapping our phones, and trying to destroy us with a bunch of made-up charges?"

For the first time, Pike's smile faded and his eyes narrowed slightly. "You know, if the feds spent as much time investigating a police department as they do investigating us, they'd eventually catch someone breaking a law. But would they call that entire department a criminal enterprise? Would they say, 'All police officers commit crimes,' the way they tell reporters like you, 'All Bandidos commit crimes'? Hell, no."

BY SATURDAY MORNING, AT LEAST FOUR HUNDRED Bandidos were in San Antonio, gathered in the parking lot of an evangelical church for Chuco's funeral. The police helicopter also showed up, circling clockwise, and an unmarked van with darkened windows stopped across the street. A Bandido scout went over to check out the van and came back to report that it too was filled with police officers, one of whom was taking photos with a high-powered camera.

Bandidos are not exactly Bible-thumpers. Only a few went inside the church for the service to hear Chuco's sister deliver a tearful eulogy, concluding with the line "Oh, Chuco, I will miss your laughing and your fighting." Those who remained in the parking lot stood around their bikes. Some of them downed beers, ignoring the handwritten signs on the church doors that read "Please, no drinking on church property." One Bandido, pretending he had

a rifle in his hands, aimed at the police helicopter and fired off a few imaginary rounds.

I strolled around the parking lot, trying to find someone to interview. Although Pike's assistants had told a few of the members that he was letting a reporter come to the funeral, many had no idea who I was. "Hi, how are you?" I said to a Bandido wearing a bandanna and dark sunglasses. "What's it to you, motherf—er?" he replied, his breath smelling of alcohol and cigarettes. I attempted to eavesdrop on a conversation among some of the older Bandidos, thinking I might hear some interesting anecdotes about the club. "Jesus, my f—ing cholesterol," one of them said. "F—ing off the f—ing charts."

I turned around and came face to face with F.O., who had stabbed me in the sternum the day before. He hugged me so hard that all the air shot out of my lungs. "Don't you f—ing wish you were a Bandido?" said F.O., which I later learned stood for "F— Off"; then he introduced me to two women whom he described as "my two Old Ladies": Meja, a blond beauty who has been with him for 26 years, and Crystal, a brunet college student who has been with him for 4 years. Crystal was wearing not only a necklace with a pendant that read "PBOL" but also a leather belt that carried the stitched-in phrase "Property of Bandido F— Off."

"I split time equally with them," F.O. said. "A few nights at Meja's, then a few nights at Crystal's, then back to Meja. Not bad, huh?"

A few minutes later, I came across an agreeable, clean-cut young Bandido named Lenny Jonas. He was 36 years old, the son of one of the first members, Steve "Panhead" Jonas, who had been shot to death at a San Antonio bar in 1983. Lenny, who was married with four kids, worked for an electric cooperative in the Hill Country. He told me he didn't see his father much when he was a boy. "But when I got older, people would talk about him—talk about his love of adventure," he said. "So I decided to get a bike. I started meeting Bandidos. And now, five years later, here I am."

As we talked, his wife, Nicole, walked up. She was 33 years old, tall and blond, and she was wearing a vest that had a patch on the back that read "Proud Bandido Old Lady." "People told me I had lost my mind when I said I was going to marry a Bandido," said Nicole, who runs a pet grooming salon in the Hill Country. "They said Lenny would be gone all the time, riding with the club to God knows where. And the truth is that I sometimes do get jealous of all the time he spends with the club. He jumps up, says he'll be back soon, and is gone for four days. But I know he loves it so much that I would never ask him to quit."

When Lenny was out of earshot, I asked Nicole what she thought about the allegations that the Bandidos were a criminal enterprise. "Well, if they are committing crimes, I don't see

them doing it,” she said. “But here’s the thing. When Lenny takes off on his bike, I don’t ask questions about what he’s doing. Lenny is a grown man. If he wishes to do something illegal, that’s his choice. All I ask is that he not bring it home and tell me about it. That way, if I’m ever asked to testify about anything, I can honestly say I do not know.”

After the service, all the Bandidos headed to their bikes. They knocked back their kickstands with their boots and roared off, lining up behind the hearse, two by two, the line growing longer and longer. The hearse and the motorcycles proceeded down a major boulevard, then turned into the cemetery, the sound of the bikes so deafening that other mourners who were laying out flowers for their loved ones put their hands to their ears.

When the hearse stopped, members of Chuco’s own San Antonio chapter carried his casket to the grave site. “Careful, now, goddammit, be careful,” someone said. The coffin was lowered into the ground, and a mariachi band sang “Te vas, ángel mío” (“You Leave, Angel of Mine”). A minister read a poem about a dead biker (“Can you feel the wind in Heaven, while the men hold back the tears?”), and right after he said “amen,” a friend of the Bandidos pulled up in a pickup with a keg of beer strapped to the bed. A few minutes later,

another car appeared, and out popped a couple of female employees of a local nude dance club called XTC Cabaret. Wearing high heels and miniskirts, they passed out flyers and free drink tickets, telling the Bandidos that they ought to visit later that night to watch them perform.

Before long, several of the Bandidos headed to the Double Deuce, one of south San Antonio’s better biker bars. I tagged along in my rental car. When I walked in, F.O., who was there with his Old Ladies, leaned into my ear and said, “Buddy, it would behoove you to buy some beers. The Bandidos would appreciate it.”

Without saying a word, I bought a round for everyone—a total of 96 beers. The music on the jukebox cranked up, and I saw Jeff Pike by a pool table.

“Are you starting to understand?” he said.

“Understand what?” I asked.

“The brotherhood. The love we have for one another as brothers.” He paused and stared at me. “You know, I feel sorry for guys who don’t have a clue what this feels like.”

I bought another round, and then another—asking questions the entire time about Bandido life to anyone who would look my way. But soon I realized the Bandidos were ignoring me

me to anyone who would look my way. But I realized, the Bandidos were ignoring me. They obviously had their own business to discuss. I looked at Pike, who raised his eyebrows.

“Time to leave?” I asked.

“Could be,” he said with a grin.

As I got in my rental car, I heard the familiar *whomp-whomp-whomp* of the police helicopter. It circled the Double Deuce—once, twice, then three times.

A few Bandidos finally came outside. They looked at the helicopter, and once again, as if given a silent cue, they lifted their hands in unison and flashed their middle fingers toward the sky.

Photographs by Wyatt Mcspadden

0

COMMENTS

SHARE

TAGS: SOCIETY, BANDIDOS



MENU

The Hell's Angels and the Pagans

BY GEORGE ANASTASIA | JANUARY 09, 2020



Hell Boy swings a mean stick.

Just ask Jeffrey Shank.

The two outlaw motorcycle gang members “got together” one afternoon back in April 2018 at a gas station on Elizabeth Avenue in Newark. Shank, who had just left the Hells Angels’ clubhouse a few blocks away, stopped to get some gas for his bike.

Hell Boy, whose given name is Robert DeRonde, pulled into the station in a pickup truck. A video surveillance camera captured the action from there. DeRonde jumped out of his truck with a metal baseball bat in his hands and leveled his first shot, a two-handed swing from the right side, at Shank’s head. The biker, fortunately, was wearing a helmet. He went down, but then tried to scramble to his feet.

Hell Boy moved in, swinging from the left side this time, and cracked Shank across the back and shoulders several times. The camera then picked up two other men closing in, one wielding what appeared to be a long metal pipe that he used to bash Shank across the ribs and back.

The three hitmen then left the scene with Shank crumpled in a ball next to his bike. DeRonde, who later pleaded guilty to an assault charge and was sentenced to four years in prison, was a member of the Pagans Motorcycle Club, according to authorities. Shank was an associate of the Hells Angels. The gas station attack was a vivid example of what law enforcement investigators contend is an escalation in tension between the two rival biker gangs who are vying for control and dominance in one of the darkest and most brutal segments of the underworld.

The New Jersey State Commission of Investigation (SCI) aired the video at a hearing in Trenton back in October that focused on what investigators say is growing concern over the violent resurgence and expansion of the Pagans.

The three-hour hearing included testimony from investigators who have tracked the activities of the club. They said there has been a rise in both membership and assaults over the past two years.

The hearing also included recorded testimony about life in the biker underworld from three former club members whose voices were disguised to protect their anonymity. And finally, there were appearances by three alleged leaders of the New Jersey branch of the organization, all of whom repeatedly cited their fifth amendment right against self-incrimination while refusing to answer nearly every question posed to them.

Like the mob, the bikers believe in a code of silence.

And like the mob, bikers have always used violence as both a negotiating tool and a way to settle disputes. The beating at the gas station was a little of both. Authorities say the Pagans are trying to move into Hells Angels territory in both North Jersey and New York.

One investigator who testified at the hearing said it was “just a matter of time” before a war breaks out between the two groups and expressed concern that “civilians get caught in the middle.”

The Pagans and the Hells Angels have been there before.

The Hellraisers Ball on Long Island back in 2002 is one graphic example. A group of about 60 Pagans stormed a catering hall where the Hells Angels-sponsored event was being held. The affair was open to the public and included blues bands, porn stars, motorcycle exhibits and tattoo contests. One Pagan was killed and dozens of others were injured in the melee that ended with multiple arrests. Police seized nearly 500 weapons that day, including guns, knives, bats and clubs. Civilians—non-bikers attending the event—were simply collateral damage, caught in the line of fire.

On a smaller scale, Pagans often boast about what is known in the biker underworld as “The Bloodshed at the Woodshed.” The Woodshed was a bar in Burlington County where on New Year’s Day in 2005 a group of Pagans and their associates attacked and brutally beat three Hells Angels who at the time were recruiting members in South Jersey and Philadelphia. Several Pagans, in fact, had “patched over,” giving up their membership in the Pagans to become Hells Angels.

A few weeks after the Woodshed attack, one of those Pagans-turned-Angels was killed in a drive-by shooting on the Schuylkill Expressway in Philadelphia after being followed by members of the Pagans from a local go-go bar.

The Pagans may not boast the membership numbers of some of the bigger clubs—the Hells Angels, the Outlaws and the Bandidos—but they have always matched or exceeded them when it comes to violence. No one has ever been arrested in connection with that murder or with the attack at the Woodshed.

It is the conventional wisdom in law enforcement circles that the Pagans thwarted the Hells Angels' attempted move into the Philadelphia–South Jersey area back in 2005. Now, the SCI seems to be saying, the Pagans have embarked on an expansion plan of their own.

One clear example, authorities said, is a change on the “colors” that club members wear. The blue denim vests or jackets with word Pagans in large letters across the back often included the location of the local chapter along the bottom. Now, authorities say, that is being replaced with the words “East Coast,” a signal that the club wants a regional rather than a local identity.

Whatever the locale, however, the club is still heavily involved in extortion, drug dealing and violence, say investigators. Meth is still the drug of choice for both sale and consumption within Pagan circles, say police. But now instead of manufacturing their own—for years Pagan Purple was a recognized brand in the meth business—most of the meth being sold by the bikers is imported from Mexico in a distribution deal with drug cartels from south of the border.

Little else has changed within the organization, with drugs and extortion being primary sources of income; violence and intimidation being a way of life, and misogyny a big part of the club's social set.

“Women are lower than dogs,” one expert testifying before the SCI said during the hearing in October. Women can never be members. Like the mob, the biker underworld is one of the last exclusive men's clubs in America. Women are designated as “property of” different club

members and can be shared sexually. They are also used to transport drugs and weapons and as messengers bringing information to and from different chapters.

The SCI hearings opened a window into the operations of the outlaw gang. The testimony and evidence reinforced much that has already been said and written.

A former Pagan, James “Jimmy D” DeGregorio, offered similar insights after he became a cooperating witness back in the 1980s. DeGregorio, interviewed for a documentary now available on YouTube, described himself as a former “cooker”—meth manufacturer—for the club. He said he turned to the government after members of his own organization tried to set him up for murder.

This was at a time when the Pagans boldly clashed with the Philadelphia mob then headed by Nicodemo “Little Nicky” Scarfo. Scarfo tried to impose a “street tax” on all drug dealers not affiliate with his crime family. Many paid. But the Pagans balked.

In fact, DeGregorio and an associate kidnapped two mobsters during the ongoing dispute and DeGregorio shot one of the mobsters as he tried to flee. DeGregorio was arrested—the shooting occurred in downtown Philadelphia and within view of several police officers. Jimmy D said he was ready to do his time for that assault. It came with his life as an outlaw biker.

What he wasn’t ready for, he said, was a plot by several Pagans who conspired with the mob to have him killed. That’s why, he said, he began cooperating

In the same interview, he offered an explanation for the biker’s code of silence, the code that he broke.

The two expressions Pagans would shout to one another after being arrested, he said, were “argo” and “nunya.” That was code, he explained, for what a biker should say in response to any question posed by law enforcement. Argo was short for “ah go f— yourself,” he said, and nunya stood for “none a ya f—ing business.”

Nothing subtle, it was an outlaw biker’s version of omerta.

Bold, brash and in your face.

Like a metal baseball bat to the head.

Just ask Jeffrey Shank.



MOB SCENE, OUT & ABOUT



New Opportunity Publishing, LLC

7025 Central Highway | Pennsauken, NJ 08109 | 856.912.4007

COMPANY

OUR EVENTS

ABOUT US

JOIN THE CLUB

SUBSCRIBE

ADVERTISE

FOLLOW US



Copyright © 2020 JerseyMan | PhillyMan Magazine . All Rights Reserved.

Dozens of squad cars respond to melee

Police say only two injured, none arrested.

Police say only two injured, none arrested.

April 02, 2006|JEFF PARROTT Tribune Staff Writer

-
-
- [Share on email](#)[Share on print](#)[Share on reddit](#)[More Sharing Services](#)

-
-
-
-

Area police broke up a large fight Saturday between rival motorcycle gangs at the St. Joseph County 4-H Fairgrounds. Dozens of people, some wielding weapons, were involved in the melee that erupted shortly after noon, police said. The bikers, including those wearing "Outlaw" and "Hells Angels" gang jackets from Chicago, Detroit and Indianapolis, were attending a motorcycle swap meet. More than 30 police cars from South Bend, St. Joseph County and Mishawaka responded to the scene. Two bikers suffered injuries that required medical attention but were not life-threatening, said St. Joseph County police spokeswoman Jaimee Thirion. A county officer, Cpl. Kent Wickham, suffered minor injuries in a traffic accident on his way to the fairgrounds, Thirion said. After bringing the disturbance under control, police canceled the remainder of the event and ordered those attending to leave. No arrests were made, police said. Dan Hardman, who with his wife had set up a booth to sell parts, described a chaotic scene. "They were using bats, (motorcycle) forks, hammers on each other, with no regard for anyone around them, even children," said Hardman, who saw an 8-month-old child in the booth next to his. Hardman, a member of a Christian biker ministry called Bikers at the Crossing, said most of the time, biking is a peaceful "family thing." This turned out to be anything but. He said a police account that only two people were injured was "baloney." "They were using fenders on top of heads, it was horrible," he said. Witness Bob Candler, of Niles, agreed. "It was pretty ugly," said Candler. "I seen a guy getting hit in the head with a hammer, he kept waling on him." Hardman voiced sharp criticism for the security at the event and its promoters, Paragon Promotions of Portage, Mich. "You don't allow colors to mix," Hardman said, referring to the fact that rival gang members were allowed to wear their gang symbols. "There should have been a lot more security. There were two (security guards), and they ran like girls." Paragon Promotions officials did not return a call seeking comment Saturday. An employee of Freedom Cycle Inc., 6210 U.S. 31 South, who declined to give his name, said the Michiana area has long been the "turf" of three gangs: the Hells Angels, Iron Cats and Devils Diciples. The gangs might have considered it poor "etiquette" when the Outlaws showed up without having first cleared it with the gangs. "It was the Angels and the Outlaws in the same place, period. That's all you need to know," said the employee, who did not attend the event but heard about it from people who did. "It's a club mentality, like one baseball team against another, or just like two high schools. There's been an ongoing dispute between the two clubs forever." Candler said the Outlaws should have been arrested. He found it odd that so many, at least 75, would come all the way from Indianapolis just for a small swap meet. "They were not there for a good time," Candler said. "I think they were there looking for trouble." Dan Brouillette, of Goshen, said he arrived shortly after police and was never allowed in. He had hoped to trade a motorcycle for some parts. He arrived to see men attempting to leave the fairgrounds

on their motorcycles, only to be detained by police officers pointing shotguns at them, Brouillete said. "The next thing I know it's a giant episode of 'Cops,' " he said. "It's the most excitement I've seen in a long time, so I'm glad I came out." But Candler was less flippant. "It was sickening," he said, recalling how a young woman turned to him and his girlfriend as the fighting broke out. "She was pretty frightened. She said, 'Don't leave me.' " Staff writer Jeff Parrott: jparrott@sbtinfo.com (574) 235-6320

The Biker Wars

BAR FIGHTS, CAR BOMBINGS AND COLD-

BLOODED MURDER--IT WAS A LOCAL BUT BRUTAL CONFLICT

BETWEEN THE OUTLAWS AND THE HELL'S ANGELS

article By James R. Petersen



DATE: November 22, 1994

FROM: Bureau of Alcohol, Tobacco and Firearms, Washington, DC

TO: All Federal, State

and Local Law Enforcement Agencies

SUBJECT: Officer Safety Advisory

"Since October 1993, a series of escalating violent acts and conflicts have taken place between Chicago-area Outlaws and Hell's Angels motorcycle clubs. This growing feud is the result of a territorial conflict involving the conversion of Hell's Henchmen Motorcycle Club to Hell's Angels. The Outlaws are vehemently opposed to the Hell's Angels' establishing a Midwest chapter and are aggressively protecting their territory. To date, as a result of this feud, there have been three documented homicides and six bombings in a three-state area. All law enforcement personnel should take extreme caution when stopping or encountering members of Outlaws or Hell's Angels motorcycle clubs."

two of America's largest biker gangs, which seemed to take Washington by surprise. In 1987 the feds arrested archangel Ralph "Sonny" Barger and dozens of his associates on charges related to a plot to blow up the Chicago clubhouse of the Outlaws. (The plan had been concocted by an undercover provocateur.) News accounts had predicted that biker gangs would just fade away without leadership. The stories were wrong.

The incident credited with escalating the conflict occurred on June 25, 1994. Peter Rogers, a.k.a. Grease or Greased Lightning, was riding his Harley-Davidson on the Dan Ryan Expressway in Chicago. A van pulled up behind him, the occupants opened fire and the regional president of the Outlaws took a bullet in the leg and another in the gut before escaping up an exit ramp.

Word of the shooting spread throughout the Midwest. The next day, the Outlaws made their annual run to the Illiana Motor Speedway for the motorcycle drag races and a swap meet. Spokesmen for the gang warned a BATF agent on the scene that if the Invaders (a club associated with the Hell's Angels) showed up, there would be "dead bodies all around." No Invaders

80 This fax may be the first document to recognize the range war between

PAGE 80

EXPERT-00001383

The Biker Wars

BAR FIGHTS, CAR BOMBINGS AND COLD-

BLOODED MURDER--IT WAS A LOCAL BUT BRUTAL CONFLICT

BETWEEN THE OUTLAWS AND THE HELL'S ANGELS

article By James R. Petersen



DATE: November 22, 1994

FROM: Bureau of Alcohol, Tobacco and Firearms, Washington, DC

TO: All Federal, State

and Local Law Enforcement Agencies

SUBJECT: Officer Safety Advisory

"Since October 1993, a series of escalating violent acts and conflicts have taken place between Chicago-area Outlaws and Hell's Angels motorcycle clubs. This growing feud is the result of a territorial conflict involving the conversion of Hell's Henchmen Motorcycle Club to Hell's Angels. The Outlaws are vehemently opposed to the Hell's Angels' establishing a Midwest chapter and are aggressively protecting their territory. To date, as a result of this feud, there have been three documented homicides and six bombings in a three-state area. All law enforcement personnel should take extreme caution when stopping or encountering members of Outlaws or Hell's Angels motorcycle clubs."

•

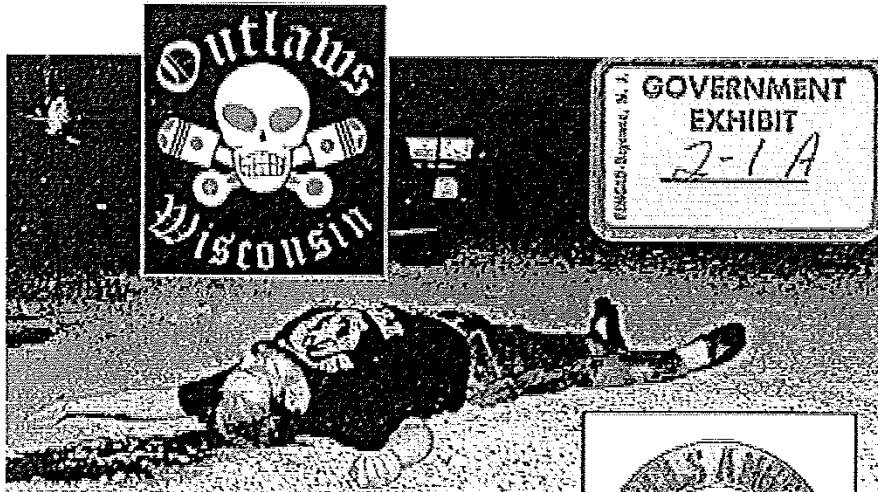
80 This fax may be the first document to recognize the range war between

two of America's largest biker gangs, which seemed to take Washington by surprise. In 1987 the feds arrested archangel Ralph "Sonny" Barger and dozens of his associates on charges related to a plot to blow up the Chicago clubhouse of the Outlaws. (The plan had been concocted by an undercover provocateur.) News accounts had predicted that biker gangs would just fade away without leadership. The stories were wrong.

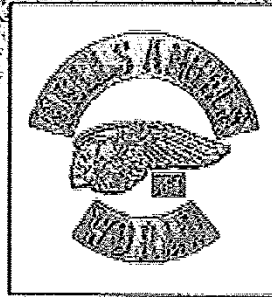
The incident credited with escalating the conflict occurred on June 25, 1991. Peter Rogers, a.k.a. Grease or Greased Lightning, was riding his Harley-Davidson on the Dan Ryan Expressway in Chicago. A van pulled up behind him, the occupants opened fire and the regional president of the Outlaws took a bullet in the leg and another in the gut before escaping up an exit ramp.

Word of the shooting spread throughout the Midwest. The next day, the Outlaws made their annual run to the Illiana Motor Speedway for the motorcycle drag races and a swap meet. Spokesmen for the gang warned a BATF agent on the scene that if the Invaders (a club associated with the Hell's Angels) showed up, there would be "dead bodies all around." No Invaders





Blood on the prairie: The government charged the Outlaws with waging a decade-long campaign of terror. Outlaw pal Donald Wagner, above, was executed during a drug rip-off in 1992; LaMonte Mathias, below left, a Hell's Henchman, was murdered in his motorcycle shop in 1994. The Angels, in turn, killed Outlaw Walter Posnjak, below right, during a wild rumble at an upstate New York speedway.



attended, but after the event, police pulled over the Outlaws' fortified war wagon—an armor-plated van with a gun port. Inside it were handguns, rifles, a submachine gun, bulletproof vests, smoke grenades, ammunition and walkie-talkies.

The day after that, June 27, David Wolf, a former member of the Insanity Motorcycle Club and a would-be Outlaw, saw an opportunity to prove himself. Kevin "Spike" O'Neill, president of the Wisconsin/State Line chapter of the Outlaws, gave Wolf a map of Rockford, Illinois with a circle around a motorcycle shop owned by a Hell's Henchman. O'Neill wanted Wolf to check out LaMonte Mathias, a nationally known drag racer and leader of the Henchmen's weekly runs. According to Wolf, O'Neill was vague at first. "I'm not going to ask you to kill the guy. I'm not going to come right out and ask you. If the opportunity comes up, do what you can." Then the Outlaw indicated by a gesture that he wanted Wolf to cut the enemy's throat. If Mathias were there

with his old lady, the instruction continued, kill them both.

Wolf traveled to Rockford with Harvey "RV" Powers, a former member of the Death Marauders, who was also a probationary Outlaw. Accompanying them was Alan "Big Al" McVay, a hang-around friend of the club. The trio partied in the car, did a few lines of coke, checked into a motel and then



Club mottoes. "Outlaws Forever, Forever Outlaws" and "God Forgive, Outlaws Don't" (below)



Outlaws on trial: the hard corps of the State Line chapter (i.e., those entitled to wear the SS emblem), above, from left to right, Harvey "RV" Powers, Kevin "Spike" O'Neill, Randall "Madman" Miller, Robert "Cloy" Kruppstadt. The scrambled image is that of hit man David Wolf, now a protected witness.

cruised the nude bars.

The next morning the hit squad overslept. Because Wolf had no tattoos that might warn his intended victim, he volunteered to check out Mathias' motorcycle shop. He tucked his unruly hair under a baseball cap, entered the shop and bought some spark plugs from a man who matched the description of Mathias.

Wolf left the shop but returned a few moments later and asked to exchange the plugs. Sensing something, Mathias dove through a door to the back of the shop. Wolf opened fire with a .45. Three slugs tore into the target's shoulder, head and neck. Mathias was still alive, but Wolf then bludgeoned the biker with enough force to break off a section of the gun's butt. Wolf tried to

(continued on page 167)

WEST COAST OFFICERS MEETING

July 14, 2007

Berdoo

NEW BUSINESS

ROLL CALL: All present

BERDOO: NNB

July 15th - Summer Bash December 9th - Toy Run March 22, 2008 - Charter 60th Anniversary

FRISCO: We are wondering what the status is on the property return from the Laughlin case. **Troy** (Nomads Nv) will be asking Judge Mahan about this when he goes to **Ray Ray's** (Sonoma Co') next hearing.

September 9th - Poker Run December 8th - Christmas Party

OAKLAND: NNB

August 25th - End of Summer Party October 20th - We will be celebrating Mike Musick's 20 year anniversary & Fuki's 30 Year along with Sonoma's 35th & O. C. 's 10th anniversaries.

RICHMOND: Todd Vernon's 17 year old son has recently passed away.

NOMADS CA: The DA in Hollister has dropped the case against Rob & Bobby

September 16th -- Fall Ball @ the Mountain House

DALY CITY: NNB

August 18th - Poke Her Run October 14th - Annual Harvest Run.

DAGO: As of 06-21-07 new hangaround **William "Lil Billy" Wright II**

SAN JOSE: Thanks to all that came with our charter to Hollister. Next Saturday there is a bike festival in our area, if anyone is interested in coming with us. We're leaving our clubhouse @ 1:00 pm

SONOMA CO: We would like to host the October WCOM to coincide with our anniversary party & the combined North & South Halloween party, on October 20th Approved by the room today. (see meeting dates below). As of 06-20-07 new prospect **Joel**

"Doughboy" Silva. As of 05-18-07 **Rick Talbot** has quit the club. (pictures passed out)

October 14th - End of Summer Poker Run/BBQ October 20th - Charter 35th anniversary party December 12th - Toy Run/Block Party

SACTO: We are submitting a USA motion today to amend our rule concerning motions for assessments/donations. (copies passed out and is also on your disk)

VENTURA: NNB

S.F.V.: NNB

January 01, 2008 - Charter 30th Anniversary Party

MONTEREY: Thanks to all that came to Hollister, special thanks to Santa Barbara & Fresno.

August 25th - Poker Run

VALLEJO: NNB

Sept. 16th - Summer Blow-Out

SHASTA CO: As of 06-22-07 **Phil Strada** quit (pictures passed out and are on your disk) Due to our low numbers we are asking to be frozen. Decided today Shasta was frozen. The three remaining members (**Billy & Red & Bobby T**) will be going to Nomads Ca. July 30th next court date for Bobby T.

August 18th -- Low Coast Run October 27th - Red & White Fright Night December 8th - Holidaze Party

ANCHORAGE: NNB

December 14th -Alaska's 25th Anniversary (party will held in Anchorage)

FAIRBANKS: NNB

ORANGE CO: As of 06-22-07 **Parker Mitchell** has left the club (pictures passed out) On the week of Sept 12th, Rod is going to be brought to Orange Co to face additional charges

October 20th - We will be celebrating our 10th anniversary (actual date is Oct 18th) in Sonoma Co. along with their 35 Year Anniv.

CAVE CREEK: Mike was arrested in Frankfort on his way to the funeral in Italy. This is an old case going back to when he was a member in Italy. Due to the federal forfeiture against our clubhouse it was decided to sell our half to the feds and move out. We will be moving out next week.

October 27th - Charter 10 year anniversary party

MESA: NNB

NOMADS ARIZONA: NNB

PHOENIX: NNB

TUCSON: Chuckles will be completing his non-assoc. and will be back with US on August 4th.

MERCED CO: As of 05-20-07 new member **Ron Monahan**. As of 06-14-07 new prospect **Chris Thissen**. Our next court date is 07-23-07 On our way to Hollister **Ray Ray** broke his foot in traffic. The next day prospect **Charlie** broke his leg.

NOMADS NEVADA: As of 07-01-07 **Johnny Merchant** has transferred to Nomads Nevada from Cleveland. **Tracy** is going to do his parole in San Jose because they won't allow him to come back to Reno while on paper.

Sept 21st - Best Breast in the West Sep 22nd - Cathouse Run

FRESNO CO: As of 07-13-07 **Mike Lynch** has transferred to Santa Barbara. Thanks to all that showed up to our Thunder Run

DENVER: NNB

SANTA CRUZ: New officers President - **Chris** VP - **Brian** Secretary - **Ricky** Treasurer - **Hector** SAA - **Justin** Our charter anniversary celebration has been changed from July 21st to August 25th (actual date 07/22/02) August 18th - Aces & Eights annual Poker Run. December 15th - Christmas Ball. **Phil** is home and doing well. He will be receiving treatments every 2-3 weeks. Thank you to all who sent cards.

August 25th - Charter's 5 year anniversary party (actual date 02/22/02) also Justin Harrah 5 Year Anniversary Party

August 18th - Aces & Eights annual Poker Run December 15th - Christmas Ball

LAS VEGAS: Cornbread's prelim hearing is scheduled for July 23rd.

September 29th – 5th Annual Strip Poker Run

R'SIDE: New president - **Paul**. Concerning the incident in Portugal, **Adam** is taking steps to meet with members from France.

August 18th -Party @ the Roadhouse.

SANTA BARBARA: As of 07-13-07 **Mike Lynch** has transferred from Fresno Co. As of 07-05-07 new prospect **John Whitaker**. Happy Anniversary to Denver. We heard from **Chad** (Dago) who said if anyone is going to Sturgis they may be able to get in and visit with him ... he is in Rapid City.

SIN CITY: As of 07-03-07 prospect **Brian** has quit. (pictures passed out) Congratulations to Ray Ray (Sonoma Co) on his new baby. July 21st - Pre Sturgis party (flyers passed out)

July 21st - Pre Sturgis party

EAST COAST: J.C. (Rochester) attended for the East Coast. ECOM notes were read and are on your disk.

GENERAL BUSINESS

- Concerning Sonoma Co's motion from last month This is a California issue and was voted on today by California only.
- We need to schedule a USA Run -2008, committee meeting ASAP. As per our roles, we need to announce the location of the run by January 1st when the money is due.
- The History Channel interview was brought up and questioned today. Answers to come next month??

- (03/10/07) Due to inappropriate behavior by people at recent past runs, it is being brought up that everyone should conduct themselves in a more civilized fashion.
- (10/21/06) ...To make things go quicker at the end of the WCOM's please bring your disk empty of all files. Thank you-
- (10/21/06) ... We spoke awhile back about the MySpace.com website and that members should not be using the club name or deathheads on their personal sites. If anyone still has this kind of content on their site... it needs to be taken off ASAP.
- (09/16/06) ... In addition to submitting the proper "out forms" on the disks, there should also be hard copies passed out at the WCOM's **IN COLOR**.
- (03/11/06) ... To all charters having a funeral, try to give enough lead time (i.e. a week) for a good attendance and to allow people to get good airfares.
- (11/14/05) ... For future reference: There have been accounts set up by Mike for our West Coast Donations.
 - 1st account: for West Coast parties, runs, monthly donations etc. Checks or money orders payable to "H.A.M.C. West Coast"
 - 2nd account: for USA Runs - Checks or money orders payable to "USA Run"
 - 3rd account: for World Runs - Checks or money orders made payable to "World Run"
 - All donations to be sent to:
 - North End Choppers CIO Mike Lynch
 - 4770 East Carmen Avenue
 - Fresno, California 93703 _
- (02/15/05) When a charter changes their email address they need to send notice of that change to Cadu (Brazil) postmaster@hells-angels.com so he can update the address book that he sends out to everyone periodically.

MOTIONS FROM TODAY

- USA-07-14-07-02 (Sacramento) To amend our existing rule concerning motions on assessments/donations. (motion passed out)

MOTIONS FROM JUNE

- WC-06-16-07-02 (Sonoma Co) To bring the membership of Shasta Coup for their patches.
 W.C. 134 YES 86 NO

Required 2/3's 147 MOTION FAILED

WORLD MOTIONS FROM JUNE 2007

- WOM 06-01-07-01 (Denmark) All future votes concerning new countries are voted on by members and not by countries. One man one vote and 3/4 majority.

W.C.	YES	NO
E.C.	YES	NO
World Total	YES	NO
Required 2/3's		MOTION

- WOM-06-01-07-02 (Spain) To host the World Run in 2012

W.C.	YES	NO
E.C.	YES	NO
World Total	YES	NO
Required 2/3's		MOTION

WORLD MOTIONS FROM DECEMBER 2006

****Note**** After discussion of the motions below at the recent WOM, the tallies for will be due at the next W.O.M. which should be somewhere around the end of the year?? So we can gather our tallies at the September WCOM.

- WOM- 11-24-06-01 (Dago) To allow the Corporation to submit motions limited only to Corporation business.

W.C.	YES	NO
E.C 129	YES	155 NO
World Total	YES	NO
Required 2/3's		MOTION

- WOM-11-24-06-03 (Dago) To reverse the decision to stop wearing, displaying and making anything portraying NAZI Items.

W.C.	YES	NO
E.C. 247	YES	44 NO
World Total	YES	NO
Required 2/3's		MOTION

CHARTER RUN REPS - NORTH

Frisco - Chris	Oakland – Marvin	Richmond - James	Nomads Ca. - Rob
Daly City - JJ	San Jose - Steve	Sonoma Co. - Nick	Sacto – Matt
Monterey - Danny	Vallejo - Steve	Shasta Co - Billy T	Nomads Wa. – Steve
Merced Co. - Ray	Nomads Nev. - Troy		Santa Cruz - Mickey

CHARTER RUN REPS - SOUTH

Berdoo - Jeff	Dago - Steve	Ventura – Joe	SFV - P.J.
O.C. - Jose	Cave Creek - Spa Bob	Mesa – BL	Nomads Az - Rick
Phoenix - J.D.	Tucson- Mac	Las Vegas - O.B.	R' Side - Atom
Santa Barbara - Archie	Denver - Mike	Fresno Co. - Mike	West Vegas-Pee Wee

NORTH RUN - SEPTEMBER 07-09

**COMBINED NORTH & SOUTH HALLOWEEN PARTY-OCTOBER 20TH IN SONOMA CO.
NEW YEARS EVE PARTY -**

MEETINGS

USA RUN: Aug. 11,2007 @ 10:00 am in Oakland
NORTH RUN: Aug. 11, 2007 @ 11:00 am in Oakland
WCOM: Aug. 11, 2007 @ 12:00 pro in Oakland
EURO: Aug. 24, 2007 @ 03:00 pro in South End Denmark
ECOM: Sept. 08, 2007 @ 02:00 pro in Providence
WCOM: Sept. 15, 2007 n 12:00 pm in Berdoo
CORP: Oct. 19, 2007 @ 8:00 pro in Sonoma Co
WCOM: Oct. 20, 2007 @ 12:00 pro in Sonoma Co.
WCOM: Nov. 17, 2007 @ 12:00 pro in Berdoo
WCOM: Dec. 15, 2007 @ 12:00 pro in Oakland